EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

TALIA N. HARRISON, *
*
Plaintiff, *
*
vs. * No. 4:21-cv-00607-ALM
*
TYLER TECHNOLOGIES, INC., *
*
Defendant. *

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ORAL AND VIDEOTAPED DEPOSITION OF

TALIA N. HARRISON

JANUARY 19, 2022

(Conducted Remotely)

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ORAL AND VIDEOTAPED DEPOSITION OF TALIA N. HARRISON, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and -numbered cause on the 19th day of January, 2022, from 9:32 a.m. to 5:20 p.m., before Leah K. Osteen Dow, CSR in and for the State of Texas, reported remotely by machine shorthand, with the witness being located in Little Rock, Arkansas, taken pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record.

A P P E A R A N C E S
(Appearing remotely)

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EXHIBITS

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EXHIBITS

it, yes.

09:43 Q. Okay. Okay. Great. And is this the offer letter you received for ExecuTime back in August of 2013?

09:44 A. Yes, that is correct.

09:44 Q. And ExecuTime was acquired by Tyler in June of 2016, correct?

09:44 A. That is correct.

09:44 Q. So in this offer letter, you were offered the position of project manager, slash, trainer; is that right?

09:44 A. Yes.

09:44 Q. And your annual salary was 48,000?

09:44 A. Yes.

09:44 Q. And the letter informed you that your position was exempt from overtime under the FLSA, or the Fair Labor Standards Act?

09:44 A. Yes.

09:44 Q. So when you received this offer letter, you understood that you would not be receiving any additional pay for hours worked over 40 hours per week?

09:45 A. Yes.

09:45 Q. So what is the ExecuTime software?

09:45 A. It's a timekeeping software used throughout different municipalities for tracking of, you know,

regular hours, overtime, shift differential pay, things of that nature. The time is calculated in ExecuTime, and then it's exported into various payroll vendors, whatever the client uses, to actually do the calculations and create the paychecks and direct deposits, things of that nature.

09:45 Q. And after the Tyler acquisition of ExecuTime in 2016, you remained involved with ExecuTime software?

09:45 A. Yes.

09:46 Q. You continued to serve in that project manager role?

09:46 A. Yes.

09:46 Q. And at some point did you become a senior project manager?

09:46 A. Yes.

09:46 Q. When did that happen?

09:46 A. I want to say that was around -- it was shortly after I started, I don't even think a year. I want to say November of -- oh, gosh. Give me one second. I'm sorry. No, the senior project manager title happened after the acquisition. That's what it was. So it would have been June, July of 2016. That is the title Tyler gave me.

09:46 Q. Did your compensation change?

09:46 A. Not with the title change, that I can recall.

09:47 Q. Did you receive annual salary increases?
09:47 A. I did.
09:47 Q. Were those for a fixed amount, or did it vary year by year?
09:47 A. It would vary year by year, but, you know, they were pretty consistent with giving me anywhere between 3 and 3.5 percent.
09:47 Q. When you worked as a senior project manager, did you work remotely, from home?
09:47 A. It -- I had the option to work from home some days, usually Fridays. But for the most part, I was -- during that specific time frame, I was going to the office Monday through Thursday, usually working from home on Fridays.
09:48 Q. When you say "that" time frame, what time frame are you referring to?
09:48 A. The time frame that we're asking, for wages.
09:48 Q. So at any point that you were in the senior project manager role, did you transition from working primarily in the office to working primarily from home?
09:48 A. Yes.
09:48 Q. When did that occur?
09:48 A. That would have been -- I want to say February of 2019 through the remainder of my tenure.
09:48 Q. And you were in that senior project manager

role until around November of 20 --

09:49 A. '19.

09:49 Q. '19?

09:49 A. Yes, ma'am.

09:49 Q. And what was your compensation at the time you left the senior project manager role in November of 2019?

09:49 A. Around sixty-four four. 64,400.

09:49 Q. And you said in February 2019 you began working from home primarily. What was the reason for that change?

09:49 A. I moved out of state, and so there wasn't, you know, an office. It was more than an hour away from the office.

09:49 Q. So at that point you wouldn't come into the office really regularly? It would just be anytime you were in town, or when would you come into the office?

09:50 A. Correct, if I was in town, and only if, you know, while I was in town I wanted to work from the office. A lot of times I would work from my daughter's house. But it was flexible.

09:50 Q. So you didn't have to come to the office when you were in town? It's only if you wanted to?

09:50 A. That's correct.

09:50 Q. How often would you say you went into the

09:50 office during that time period?
09:50 A. Maybe two or three times.
09:50 Q. Two or three times from February 2019 until around November 2019?
09:50 A. Correct.
09:51 Q. And when you were a senior project manager, did your duties evolve, or did they stay pretty consistent throughout that time period?
09:51 A. They -- I would say they stayed pretty consistent.
09:51 Q. I want to talk a little bit about your job duties as a senior project manager, and I think it would be helpful to kind of start generally.
09:51 So as a senior project manager, you helped oversee implementations of the ExecuTime software, correct?
09:51 A. That is correct.
09:51 MR. HERRINGTON: I'm sorry. I need to --
09:51 Q. Can you --
09:51 MR. HERRINGTON: Excuse me. I need to make a small objection for vagueness. Are we talking only about after the promotion?
09:52 MS. BROWN: When she was promoted in June or July of 2016.
09:52 MR. HERRINGTON: Oh, that was -- I'm

sorry. I mixed up dates. I have that as a later date. Then I guess we are talking about senior only. Okay. Sorry.

09:52 MS. BROWN: No problem.

09:52 Q. So going back, Ms. Harrison, so can you kind of explain, I guess, kind of the life cycle or the phases that a senior project manager would be involved with with an implementation of ExecuTime software?

09:52 A. Sure. So, you know, once the -- the project is assigned to the project manager implementation consultant team, the PM -- is it okay to refer to project manager as "PM"?

09:52 Q. Sure.

09:52 A. Okay. So the PM would be responsible for hosting a stakeholder's kickoff call with the client. Prior to that call, the project manager will have reviewed a questionnaire that typically is provided by sales initially. And during the transition over to the project manager, it's completed.

09:53 So we would review the questionnaire. We would, you know, read the contract, understand the number of powers or the type of contract it was. We would map out an implementation timeline for the IC that we're assigning that project to, you know, based on their current availability. And so we're basically

prepping for the stakeholder call so that we could review all of this documentation on that call.

09:53 Once we have the stakeholder presentation, it would be up to the project manager to stay in communication with the client, to give them an opportunity to review the timeline, you know, make sure that that lines up with their current schedules and priorities. And then ultimately we're requesting sign-off on that timeline before we start to engage the implementation consultant.

09:54 While we're waiting on that signature, there were templates that were preconfigured based on the type of implementation and the way the client was hosted. So if they were on premise or if they were a SAS client or an ASW- -- or AWS cloud, there was different templates that you would choose from in Jira, which was a ticketing system.

09:54 And so you would go in and clone whatever template best fit that project. And there were about 32 tasks that the PM and the IC would have to go through through the life cycle of the implementation.

09:54 And so since it's a template that we were cloning, we would have to go in and rename the initial template to whatever the client's name is, and then we would have to go in and manually touch each task and

rename it so that it doesn't read "template," but, in fact, it reads, you know, whatever the client's name is and whatever that task to be completed was.

09:55 Throughout the life cycle of the implementation, we had to keep those tickets up to date with the number of hours or even minutes spent on working that particular task. We had to copy our email conversations regarding that task into the ticketing -- into that task ticket in order that the conversation happened so that it would be easy to read.

09:55 We would have to -- every time, of course, we spent time on that particular task, we would have to update that task with the amount of time spent and basically just keep notes there so that if anyone came in and needed to step in for us, they could very easily, you know, reference where the project left off.

09:55 So once we -- we have that signed, implementation timeline, at that point we would host a kickoff call to introduce the IC to the client.

09:56 And, I'm sorry, I need to back up just a second. So from the questionnaire, the project manager was also responsible for taking that questionnaire and producing what we called a scope of work or a -- yeah, pretty much a scope of work. And it basically -- or solution design is another term for it. But we

basically would outline based on what they answered in that questionnaire what we would be implementing, you know, what our pilot users would be, how things would be phased out.

You're pretty much putting together a synopsis of what you're going to deliver to the client. And that's also something that would have to be signed off on with the timeline.

So once you have all those documents and you start to -- you introduce your IC, the PM would then be responsible for just managing the project. Anything -- the budget. Anything that came up during the implementation as, like, an escalation, we would -- the project manager would be the one to communicate that with the manager of implementation to come up with an action plan for moving forward. So I guess you would call that, like, issue resolution or escalations.

Q. Now, what about after the implementation progressed? If there's a go-live period, what's the project manager's responsibility during that period?

A. Sure. So it's actually really the IC's responsibility to keep up with that go-live. For the most part, the project manager is just communicating and making sure that we stay on track for that date. You know, if the IC runs into any complications where they

feel like, for whatever reason, they're not going to meet the date that we set, we would work directly with the ICs on -- on a solution to that. A lot of times management would be involved in that as well.

09:58 Also, as a project manager, you know, we were responsible for, you know, allowing new hires to shadow us to get experience and help with projects that we're currently working on. We were training new hires.

09:58 Q. And this would be new-hired PMs?

09:58 A. Or ICs. During that -- my tenure, during that time, it was just myself and one other lady that had the most seniority. And so during that time period, we had five or six new implementation consultants. So we all kind of had to, you know, pitch in and assist with getting them up to speed so that we could come off the road, because we were also -- myself and Jessie Bell, another project manager there, we were doing a lot of the IC work as well just because there was so much turnover.

09:59 And we constantly, you know, had so many new people at one time, we were having to travel and do on-site trainings and, you know, remote trainings and things like that that the ICs typically would do under the Tyler umbrella.

09:59 Q. And so was there a difference in duties between

a project manager and a senior project manager?

09:59 A. There was not. I think that's just a title they gave me because I had been there for so long. I didn't -- I mean, I don't think it was a promotion, but maybe so. I didn't even know that my title had changed. I had to ask about it.

09:59 Q. I think you referenced that there was one other project manager there at that time. Is that right?

09:59 A. There were a couple of other project managers at that time, but myself and Jessie Bell had the most seniority at that time. We had both been there five, six years; whereas, everyone else were within, you know, anywhere from six months to maybe a year, year and a half.

10:00 Q. Was Jessie Bell also a senior project manager?

10:00 A. She was, uh-huh.

10:00 Q. How many project managers total were there at one time?

10:00 A. During that time frame, there was -- I'm going to say four; however, one of them was actually the manager of implementation, but she was working as a project manager as well because we were so -- you know, so short-staffed.

10:00 Q. And the manager of implementation, would that have been your supervisor?

one screen and the solution design on another. We would have had calls and things like that to go through the questionnaire as well. I think I left that off. Again, you know, I haven't worked in that position for a couple of years now, so I'm a little dusty, but ...

10:06 So we'd basically have the two documents on two monitors. And based on what we have from the questionnaire and what we obtained from the solution design call, we would go -- you know, pretty much just go in and type into the template the -- whatever lined up with the questions -- line the questions up with the template for the solution design. In some cases, you can copy and paste, but a lot of it was manual entry, like, data entry.

10:07 Q. And then was there information in the solution design that you would remove if not applicable to the client based on their answers to the questionnaire?

10:07 A. Yes.

10:07 Q. And you said you had calls to go through the questionnaire?

10:07 A. We did.

10:07 Q. Would these be calls between yourself and the client?

10:07 A. Yes. We would have a call with ourself and the client to go through their questionnaire and get more

in-depth answers to the questions that they answered or, you know, validate any information that we didn't understand from the questionnaire that they filled out. There would be a call to go through that. There would also be a --

10:07 Q. And who would be on that call?

10:07 A. Sure. That would be myself and the client.

10:08 Q. So in advance of that call, you would have reviewed the questionnaire to see if there was anything on there from the client that you didn't understand that you needed to discuss on the call to the client?

10:08 A. That is correct, yes.

10:08 Q. Okay. And then based on that analysis and that phone call, you'd be able to complete the solution design?

10:08 A. You got it.

10:08 Q. And then also creating the -- I think you referred to it as an implementation timeline. How would you go about creating that document?

10:08 A. I would pull up my implementation consultant's calendar. Since I only worked with one, you know, I pretty much know what her schedule would be and when she would be available.

10:08 So I would just go through and pick dates. The timeline was also a template, and so -- with

10:10 Q. So in this timeline document that you would be creating, were there phases that were just standard to every implementation, or did the phases or training differ based on each client's implementation?

10:10 A. The phases would be pretty standard, but what the client would need in those particular phases is what would -- would differ.

10:10 Q. So how would you know what the client would need for a particular phase in order to complete the timeline?

10:11 A. It would be based on, you know, things discussed during the solution design call. Usually it's -- usually in that way, because the phases were the same. But what they need -- for instance, you know, they may not use overtime or shift differential or something like that.

10:11 So when we would actually get down to the training, we would tailor that training specific to that client. If they don't use overtime, well, we're not going to show overtime. That type of thing.

10:11 Q. So you said based on the solution design call, you would -- you would have that as an understanding of what specific needs the client would have for the different implementation phases.

10:11 Are these the solution design calls that

you referenced earlier where you would go through the questionnaire?

10:11 A. Yes.

10:11 Q. And so these were calls between yourself and the client?

10:11 A. Yes.

10:12 Q. So you've mentioned training for clients as well. Did you conduct training as a project manager?

10:12 A. I did, quite a bit.

10:12 Q. It sounded like there were different kinds of trainings that each client might have as part of the implementation. Is that right?

10:12 A. Yes. I mean, they typically all have the same training. So they have, you know, a timekeeper training. Those are going to be what we would refer to as basic users or hourly employees. So everyone would have a basic -- or -- yeah, basic user training.

10:12 Everyone would have a supervisor training, where we would work directly with the supervisors. And they would have to go through the basic user training as well as supervisor training since they would be users themselves but would also be, you know, supervising subordinates.

10:13 And then everyone had an admin training. Usually the admin training would just be with IT and

shortly here. I just want to kind of wrap up this line of questioning.

10:22 MR. HERRINGTON: Sure.

10:22 Q. So you said management would get involved if you needed to move go-live dates or if there were client complaints about an IC, or implementation consultant, or, I guess, specific requests for you to do training by the client.

10:22 Were there other areas where you would get management involved during the implementation?

10:22 A. You know, pretty -- anytime that there was any type of an escalation or a -- a decision needed to be made that impacted the project, we would have to get management involved.

10:22 I'm trying to think of any other specific scenarios. I can't think of any other specific scenarios. But, I mean, we would meet with management regularly and give them an update on every single project and where that project stood.

10:23 And so as the PM -- when I say "we," the PM would meet with the -- with managers, and so -- and they would meet with ICs as well. But we would go through projects. And so at that time, if we're -- you know, something came up, we would discuss resolutions or how to approach, that type of thing. So management was

involved pretty heavily.

10:23 Q. So you said you -- you involved them for go-live dates, for client complaints regarding implementation consultants, or client requests for you to do training.

10:23 Other than those specific examples, can you think of other times where you involved management?

10:23 A. If a contract was originally written for remote training and the client later decided they want on-site.

10:24 Q. Any other examples you can think of?

10:24 A. Not that I can think of.

10:24 Q. And then you also said that sometimes you would have to train a client multiple times or retrain them based on an issue.

10:24 Who would make the decision that a client needed to be retrained or trained again?

10:24 A. Management.

10:24 Q. And would you tell them, I guess, during one of your check-in calls that it was your, you know, opinion that this client needed to be retrained or trained again?

10:25 A. I wouldn't make any recommendations either way. I would pretty much just discuss the complaint, and management would make a decision, because I wasn't allowed to make -- usually if there was an issue with a

10:26 Q. And who would be on those weekly calls?

10:26 A. Usually just project management and the client -- or project manager, rather, and the client.

10:26 Q. And then if clients did need to be retrained or trained multiple times, that would require you to go back and adjust the implementation timeline?

10:27 A. Not -- not all the time, because usually I -- I would build buffer room around the training session to give, you know, the clients the opportunity to go back and -- we recorded our trainings and provide -- every training was recorded and provided to the client.

10:27 And so, you know, we would want to build buffer room into the timeline to make sure that they have an opportunity to go in and watch the recording and get in the system and play around with it. So not every time, no.

10:27 Q. And then how would you account for buffer time when you were building out an implementation timeline?

10:27 A. Usually it -- you know, it helped because our ICs were always booked back to back. So a lot of times we couldn't help but put the buffer time in.

10:27 But usually it was based on blackout dates provided by the client. It would -- we would, you know, look at what else the IC has scheduled, and then we -- the timeline that we were using, like I said, had

courthouse, in a -- just in an empty space. And usually there -- it would be a classroom-type setting. A lot of cases, they would have computers set up so that as you're going through the training, you can pause and let users log in and do things as well.

10:42 And we would, you know, be standing in front of the class, and we would have a TV or a projector, or what have you, connected to our laptop, and we would conduct the training in their training environment. In some cases, we would be at city hall, and the trainings would be recorded by someone, by the client's staff, so -- but it was always in a classroom-type setting and within their actual system.

10:42 Q. You said you would configure the training before you went to the client's site; is that right?

10:42 A. Yes, that is correct.

10:42 Q. Explain to me what configuring it would entail.

10:43 A. Sure. So there's -- in ExecuTime there were a few imports that would take place. So we would import employee demographics, phone numbers, addresses, you know, employee status, that type of thing. But then if they were using -- if they were using, let's say, overtime or shift differential, we would actually have to go in and configure that.

10:43 If they weren't going to have users

clocking in and out, we would have to go build security walls to say, you know, okay, this particular employee's going to clock in and out versus these employees are going to do manual time sheet entry.

10:43 And usually you would -- you would configure both types of scenarios, so that if it's one of the initial trainings, where a client doesn't know exactly which option they're going to choose, you can show both, you know, to give the client a better idea of what their options are. And then, you know, they can make a decision from there.

10:43 So we would have to build, you know, security permissions. We would have to go in and build overtime rules and shift differential rules. We would go in and prepopulate time cards so that when we're going through the training, we're not actually clocking in and out or doing time entry. We're basic- -- we'll show how that functionality works, but then we can go and show them how the time card would look based on the time entry type that's -- that's chosen.

10:44 Q. So it sounds like some of the configuration that you needed to do you might learn during an initial training with the client, but would other, I guess, instances of configuration that needed to occur, would -- how else would you figure that out if it wasn't

through an initial training?

10:44 A. Yeah, so during training, usually the client can identify, Oh, well, we forgot about this.

10:44 It's almost impossible to capture everything in the solution design. And then also once they have a better understanding of how ExecuTime can be configured, and they realize that not every department has to do things the same way, a lot of times we would leave those trainings and have to go back and make adjustments based on the client's new understanding of what their options are.

10:44 Q. So some of it would come through the solution design; some of it would come through training as it evolved?

10:45 A. Yes.

10:45 Q. And what would that look like? The client coming to you and saying, You know, after seeing this feature, we want -- we want to change it this way, and then you would go and configure the setup?

10:45 A. A lot -- yes.

10:45 Q. And then I guess for the customization, you would know through the solution design? That's something that you would just, I guess, learn from going through and reviewing the solution design that you created from their questionnaire?

request it, and then management would come, come to me.

(Exhibit 2 marked.)

10:54 Q. Okay. I've shared what will be Exhibit 2 with you. Do you see that in front of you, Ms. Harrison?

10:54 A. Yes, I do.

10:54 Q. And do you recognize Exhibit 2?

10:54 A. I do.

10:54 Q. And is this a résumé that you had prepared?

10:54 A. Yes.

10:54 Q. And it looks like you prepared this while you were still working at Tyler in the senior project manager role. Is that right?

10:55 A. Yes.

10:55 Q. I wanted to ask you about some of the bullet points that you had included in this résumé.

10:55 Do you see about halfway down, on the first set of bullet points under senior project manager, there's one that starts with "Manages, monitor, and motivates"?

10:55 A. Yes. Yes, I do.

10:55 Q. Okay. And it says, "Manages, monitor and motivates the cross functional team assigned to each project."

10:55 Who would -- who would be the cross-functional team that you're referencing there?

10:55 A. Sure. So it would be the implementation consultant that I'm working with; it would be the team responsible for deploying the software to the servers; it would be any technical contacts that are -- that are helping with establishing the email configuration within ExecuTime so that the email server talks to ExecuTime, sends notifications.

10:56 The technical team would also assist with time clock setup that needed to be done on a server so that my IC could actually train on the time clock. The technical team would also assist with any type of technical calls that we had to discuss server specifications required for the installation of ExecuTime, those type of things. So it's typically Tyler, Tyler teams.

10:56 Q. Okay. And that would consist of the implementation consultant, the deployment team, and the technical contacts?

10:56 A. Correct. And I would include management in that as well because, you know, sometimes we would have to get them involved if, you know, an installation couldn't happen sooner, you know, as soon as we needed. We would have to go to management for management to go to the manager of, you know, those teams to kind of get things pushed through.

10:57 Q. And so when you said you managed the cross-functional team, how would you be managing those different groups?

10:57 A. We're still managing the communication between all groups so that we're all on one accord and can set, you know, appropriate expectations.

10:57 Q. And that would be all, I guess, with the purpose of getting this implementation done, you know, on schedule, within scope?

10:57 A. That is correct.

10:57 Q. What about "monitor and motivates"? How would you do that?

10:57 A. So there were some times where we would have to put tickets in to have things done. And so I would monitor the ticketing system to make sure that -- because when you initially enter a ticket, it's in just -- in a pool with other tickets that have to be assigned or pulled from that queue. Excuse me.

10:58 And so I would just monitor to make sure that that's happening in a timely manner and it's been assigned to a representative, so that once it's assigned to a representative, I know who I can go in and touch base with as to when it will be completed.

10:58 Q. And then what about the "motivates"?

10:58 A. That would just come from, Hey, team, you know,

can -- it would be great if you can kind of get this done by this date; the client has expectations of such-and-such from sales. You know, just trying to, you know, just promote a healthy working team morale.

10:58 Q. And you were often, I guess, out of that team, the one that had the direct client contact, so you were aware of what the client's expectations were as far as progressing and the schedule?

10:58 A. Exactly.

10:58 Q. And then a couple of bullet points down -- it looks like -- one, two, three -- the third bullet point down from that one, there's a bullet point that says, "Creates and delivers customized ExecuTime client training sessions via the web and/or on-site visits to ensure client satisfaction and product knowledge."

10:59 Do you see that?

10:59 A. I do, yes.

10:59 Q. How were the ExecuTime clients' training sessions customized?

10:59 A. Sure. So just kind of going back to what I mentioned earlier, it's just, you know, we have a list of -- a template list of what's covered under each training session, and then you're basically just omitting whatever doesn't apply to the client.

10:59 Q. And you would -- I think we talked about

mean, I -- I maintained anywhere from 19 implementa- -- 19 to 23 implementations at a time. It may or may not impact the existing clients or the current clients that I was working on. It was more so just knowledge share.

11:06 You know, we wanted to always have knowledge sharing going on amongst the team and making sure that everybody knows what's available, what's new and -- you know, new to the software, so that as they're training clients, they can incorporate that into their training sessions.

11:07 Q. And in the next bullet point down, you said, "Continuously consults with Stakeholders regarding their specific company operations in order to recommend best utilization and customization of ExecuTime configuration."

11:07 What recommendations would you be making regarding utilization and customization of ExecuTime?

11:07 A. Sure. So as we're configuring security roles, so when you build a -- or security permission role in ExecuTime, you typically want to, you know, try as best you can to encompass security setup based on a group of individuals, so that if you have 200 employees, you don't want to have to create 200 security roles to accommodate how they're going to use ExecuTime.

11:08 You would -- the preference would be to

create a security role, and that one security role would be applicable to multiple users, so that once you create that role, you can go into the user profile, assign that security role, and, you know, that knocks out, you know -- I don't know -- 30 of your users. And then you may have to create another security profile that matches how the next 30 or 25 users are going to use ExecuTime.

So it's basically making recommendations on what ExecuTime could do for them so that they're setting it up in a way that it won't become a maintenance nightmare, so to speak.

Q. Gotcha.

Other than the security setup, are there other examples of recommendations with respect to utilization or customization of ExecuTime configuration that you would make?

A. Uh-huh. There were other areas of the application that held the same type of -- based on how you set the system up in reference to the available functionality is going to determine what it's going to take to maintain the system going forward, as you have, you know, people terminate or new hires come in or rehires or whatever the case may be.

So a lot of the recommendations would be, Okay, based on what I'm hearing, this group of employees

handles things this way, whereas this group of employees handles other scenarios a different way. So let's, you know, build a configuration within ExecuTime, you know, using our options available like this so that going forward, as you're maintaining the new hires and what -- and so forth, you can, you know, easily group employees together or classify employees. That was pretty much -- that's it.

11:09 Q. So you would be able to kind of come up with these recommendations for how they build out or configure ExecuTime based on, I guess, client calls and just your communications with the client, understanding their specific setup?

11:10 A. Correct. And -- right, and comparing that what -- to what ExecuTime offers, what ExecuTime -- you know, what ExecuTime can do.

11:10 Q. So on this next bullet point, it continues on to the second page. It says, "Responsible for completion of projects on time, on budget, on specification. Performs a variety of tasks including, but not limited to, scheduling all resources; setting deadlines; assigning responsibilities; and monitoring, summarizing and communicating the progress of the project."

11:10 What -- what -- I guess, what would you be

referring to when you said you were scheduling resources?

11:10 A. So the implementation consultant and the technical team. So, you know -- or -- and even deployment. So once we have the timeline built, you know, and we've got an idea of -- you know, a lot of our clients came in ready to run with implementation. It was, like, they had a timeline as to when this needed to be done. They were going to be losing access to their existing payroll system within a certain time frame.

11:11 And so that would just be me assigning resources, make sure the deployment's done by this date, you know, make sure the technical team has access to the server there on prem, and I need them to go in there and do any configuration before my IC can go in and set the database up and prepare for training and things of that nature.

11:12 Q. And so how specifically would that be accomplished? Would you just be sending emails to these different members of the implementation team and just telling them, like, Hey, I need you to do "X" so we can get "Y" rolling? Is that right, or --

11:12 A. Uh-huh. Some -- some -- some was via email. And then, like, for deployment, we actually had Jira. We would use Jira. And, again, it was a ticketing

system. And so then we would put a ticket in, and we would put specifics in that ticket as to when we would need that task completed by.

11:12 And then usually they would communicate back if they weren't going to, you know, be able to make that date, or if they could pull it forward. You know, they wanted to verify that was okay.

11:12 But, yeah, it would be primarily emails, or we would use the Jira ticketing system.

11:12 Q. And when you said "assigning responsibilities," what does that look like? Is that you telling the implementation consultant what part of the project they're going to take on, or what exactly?

11:12 A. Yep, it would be that. You know, yeah, exactly, because even with, like, time clocks, you know, you know, we would have to specify -- Okay, you know, technical team's going to do the server setup and make sure that one clock is up and running, and then, you know, you're responsible for making sure that you train for that one clock and that IT knows how to go in and set up the remaining clocks.

11:13 So, you know, again, based on the number of hours in the contract, we may have -- there are some -- in some cases, we would do a lot of setup for the client. But if it was a smaller client or they

purchased smaller hours, then I would work with the IC to help them understand that, Okay, since we have a smaller budget to work with, these are things that you'll do, and then this is what you need to try to push to the client in order to, you know, make sure that we don't exceed the budget or have to go back and ask for additional time.

11:13 Q. And then the second complete bullet point on this second page, it says, "Efficiently and competently manages problems, changed requirements, missed deadlines, etc."

11:13 What problems would you be managing?

11:14 A. If something was missed. If, you know, a technical call didn't take place and, you know, they didn't understand that they were supposed to have something completed by a certain date. Usually I would have to go back and communicate that back to management so that -- you know, that management could work with the manager of the team that would actually complete that task to see if we can get it pulled forward or, you know, get it done.

11:14 If the user -- I'm sorry, the IC got in and started doing training, and, you know, they were receiving errors all over the place or deadlocked, you know, messages or something like that, I would have to

communicate that back to technical teams and management to work through those issues.

11:14 You know, there's been times where we got on the phone to do training and it's obviously the client isn't paying attention. So just things of that nature.

11:15 Q. So it sounds like, you know, there's a variety of different problems, and depending on what the problem was, you might have to loop in a different person to help resolve that problem. Sometimes it might be management; sometimes it might be tech support, it sounds like.

11:15 A. That's correct.

11:15 Q. Is that fair?

11:15 A. Yes.

11:15 Q. Okay. And then you said "changed requirements." What were -- what are you referring to by "changed requirements"?

11:15 A. That would be, you know, if a client were to, you know, go from wanting -- go from the web-based trainings to on-site training, or if they're requesting additional time for training because they want us to train their users. So it would be changes to the solution design.

11:15 So, typically, once they signed off on

that solution design, if there was anything that came up that would cause issues with the budget, then that would be something that I would take back to management.

11:16 Q. And then so when you say you had to manage the problems and changed requirements, you would escalate it appropriately.

11:16 And then would you be responsible for seeing through the -- you know, whatever the client was wanting, whether it was changing to web based, that it actually was implemented at the end of the day, that they were able to change the solution design or --

11:16 A. That is correct.

11:16 Q. You stayed in contact with the client?

11:16 A. That is correct. Yeah, I would pretty much be the -- the go-between between the client and management and whatever decisions are made, and I would communicate that between -- between all parties.

11:16 Q. So with this next bullet point -- it says, "Schedules resources for each project and ensured resources are sufficient." Who would be the resources that you're referencing there?

11:16 A. Implementation consultants and other cross-functional teams, like, the tech team, development team, engineering team.

11:16 Q. So were you responsible for, when you had an

implementation assigned to you, I guess, selecting the IC to work through that implementation with you?

11:17 A. No. I had an assigned implementation consultant. And so I -- that was the only implementation consultant that I was -- that I was booking for. That was the only resource that I would -- that I would, you know, schedule for as far as implementation consultants.

11:17 Q. So what was -- oh, I'm sorry. Go ahead.

11:17 A. No, that's okay. Go ahead.

11:17 Q. So what would happen if the implementation consultant that you typically worked with was not available to take on a new project or maybe didn't have the experience to handle the implementation?

11:17 A. In most cases, I would fill in. If I wasn't able to fill in for whatever reason, then at that point we would go to management, and management would talk to other project managers to see if their ICs had any flexibility.

11:18 And a lot -- in a lot of cases, especially during that specific -- you know, the specific time frame that we're talking about, they -- we had a lot of new people. So it was kind of easy to pull in someone else because it was an opportunity for them to test what they'd been learning and then also kind of get their

feet wet.

11:18 So depending on the type of training, as long as it wasn't, like, configuration or admin, if it was just, like, a basic user training or supervisor training, usually they could step in. If it was something more like an admin training or a payroll export training, then I would -- I would step in just for the -- you know, just to ensure that we kept the ball rolling.

11:18 Q. Okay. So you kind of have, like, your default implementation consultant; and then as needed, you could pull in another one?

11:18 A. I could request that we can pull in another one. I couldn't go to another IC and say, Hey, can you step in for Suzi, or anything like that, no.

11:18 Q. So I think you said earlier you had, like, 20-plus projects going at a time.

11:19 So when you were managing 20-plus projects, would it be feasible or did it happen that you had more than just one IC that you'd be working with?

11:19 A. Would you mind repeating that?

11:19 Q. Yeah. I think earlier you said you had, like, 20 implementation products [sic] at a time specifically.

11:19 So when you were managing 20, across all 20, was it always your default IC, or would sometimes

one of these other ICs that had been borrowed be mixed into those 20 different projects?

11:19 A. Yeah, for me, it was always the one IC.

11:19 Q. Can you think of an instance where you had to pull another IC in from a different project manager?

11:19 A. I cannot, huh-uh.

11:19 Q. Did you ever request one?

11:20 A. Honestly, I don't remember.

11:20 Q. And when you say there that you ensured resources are sufficient, what are you referring to by that?

11:20 A. Pretty much just making sure that -- you know, whatever the timeline we were producing, that we had the appropriate resources available for the dates that are outlined in the timeline.

11:20 Q. And so that would be, you know, staffing appropriately as well?

11:20 A. Yes.

11:20 Q. This next bullet point, you say, "Assists with onboarding process for new hires through recruiting, interviewing and hiring."

11:20 Explain to me a little bit, I guess, about your role in the recruiting process.

11:20 A. Sure. So in the recruiting process, I -- during my time at Tyler, I referred, and they hired,

gosh, probably seven -- seven to nine employees. So recruiting would be actually just more so, you know, people that I worked with in the past that were looking for different -- new opportunities. You know, I sent their résumé on to management for consideration.

11:21 Q. Do you remember who specifically you recruited to Tyler? I know we talked about Ms. Greene.

11:21 A. Yeah. Ms. Greene, Latisha Harrison, my sister; Jim McMain. There was a Nichole -- or Nichole Schrader (phonetic). She's no longer with Tyler. There was a Krista Bailey. She's no longer with Tyler. I'm trying to think who else. So maybe it was five employees. I feel like there was more, but I can't think of the names.

11:22 Q. When you said you would interview new hires, tell me about that and your responsibility there.

11:22 A. Sure. So usually anytime management had, you know, done the first, initial interview, if it was someone that they felt would be a good fit, they would ask the team to do a team interview with that candidate. And they would provide a -- they provided a list of questions to help facilitate and drive conversation with the new hire.

11:22 And so we would kind of do a roundtable with myself and other project managers, and even in some

split employees into different groups so that we can configure the application to function, you know, the way that it needs to based on their classification.

11:34 Q. Okay. So --

11:34 A. And a lot of times -- I'm sorry.

11:34 Q. No, go ahead. Go ahead.

11:34 A. Well, no, I was just going to say, a lot of times, you know, that would cause the client to have to go back and do some reengineering of their business processes, which was to be expected. Most of our clients came from paper timekeeping. And they were going to electronic, so changes would have to be made, and they recognized that.

11:34 Q. So "analyzing user requirements" would refer to, I guess, kind of learning about the client's business and processes, and it's applying your knowledge of ExecuTime to under- -- to explain to them how it would work with their specific protocols and policies?

11:35 A. Correct.

11:35 Q. And then sometimes that would result in the client needing to change certain, I guess, procedures they had?

11:35 A. Yes, that is correct.

11:35 Q. Can you think of a specific instance where a client had to go back and change a policy or procedure

based on your discussions with them?

11:35 A. I mean, I can't think of a specific time, no, but, I mean, it would -- it would happen all the time just because, again, you know, what their expectations of the software are doing versus what ExecuTime could actually do. That was a continuous, repetitive conversation that we would have with clients, and they would have to make adjustments accordingly.

11:36 Q. But you can't recall any specific adjustments that clients had to make?

11:36 A. Well, I mean, the specific adjustments would have to be the classification of the security roles and things that we spoke about earlier.

11:36 Q. But that's stuff you're doing on Tyler's side. Is there anything that you're aware of that clients had to go do on their side after you had those conversations with them?

11:36 A. Oh, I see what you're saying. I'm sorry. I see what you're saying. Okay. Let me think about this for a second.

11:36 I mean, the only thing I could really think of is, like, if the client was expecting to be able to require a certain group of employees to do manual entry or clock in and out and then later realized that -- because they actually have to have access to a

computer or a time clock. And these users work in the field. They don't report to an actual location.

11:37 They would have to go back and say, Okay, never mind. You guys are not going to clock in and out with a manual entry. We're going to prepopulate a time card for you.

11:37 And then at some point, you know, within the two-week or the one-month pay period, whatever the case may be, the user would have to make sure that they access the application at least one time and approve the time card.

11:37 So I guess to summarize, you know, making changes based on how they're expecting to do time entry for certain groups.

11:37 Q. Any other changes you can think of that clients have to make?

11:37 A. Well, they -- yeah, they would make changes to when they run payroll, because, again, you know, they were used to having paper time cards, and they had a timekeeper or someone that manually went in there and keyed everyone's time, verified it, to now having an automated process.

11:37 So instead of having to do the payroll processing, you know, by Monday at 12 a.m., they were able to extend that a little bit more because everything

was electronic. But that would be it.

11:38 Q. The next bullet point, it talks about analysis you did for City of Buffalo, New York, Public Safety.

11:38 And I think -- is that analysis what we were talking about earlier where you did the demo with sales?

11:38 A. That's the one --

11:38 Q. I know --

11:38 A. Yeah. The demo with sales, that was -- I think that was Troy, Michigan, we went to. This instance at Buffalo was when myself and a Tyler -- another Tyler project manager went on-site and sat down roundtable with the team and discussed just, you know, what ExecuTime offers and -- as far as functionality and whatnot.

11:38 They threw scenarios at us, and we talked through -- spoke through how we can -- how we could accommodate that in ExecuTime and whether it would be something we can automate or not.

11:39 Q. And then with the "Assists sales team as aid during multiple sale demos onsite as well as over the phone," that's what we were talking about earlier where you said it was Troy, Michigan?

11:39 A. You got it. And there were --

11:39 Q. Okay.

12:17 A. Oh, yes. I'm sorry. Yes. At the time when we actually had implementation consultants, yes, they were provided a copy.
12:17 Q. I think we talked about earlier how ExecuTime was acquired in June of 2016. And it looks like the dates in this project plan are 2017.
12:17 A. Uh-huh.
12:17 Q. Was it -- was it your understanding that in 2017, 2018, they still hadn't broken out the project manager and implementation consultant role?
12:17 A. Yeah. If it was -- yeah, I want to say it was getting closer to that 2018 year that they started breaking that role out, if I'm not mistaken.
12:18 Q. So there's this tab down here labeled "Imp Billing," which I --
12:18 A. Uh-huh.
12:18 Q. -- assume is for "implementation billing."
12:18 A. Uh-huh.
12:18 Q. Do you see that screen in front of you?
12:18 A. I do.
12:18 Q. And it looks like there's various individuals listed under the "Completed By" column.
12:18 A. Uh-huh.
12:18 Q. Hillary, yourself, and Trey.
12:18 A. Okay.

12:18 Q. We established earlier that Trey was an implementation consultant; is that right?
12:18 A. That is correct.
12:18 Q. So it looks like Trey would have been working on this implementation?
12:18 A. Yes, I agree.
12:18 Q. And so where -- were you responsible for, I guess, managing this tab of the spreadsheet where there was a breakdown of hours?
12:19 A. Yes.
12:19 Q. And how would you do that?
12:19 A. So ... Gosh, I don't even -- primarily, going through the Jira tickets and just confirming. So as you work the tasks -- a task in Jira, you would, you know, like I said, enter your time that you're billing and close that task out. And so I would just line this up with the tasks in Jira.
12:19 Q. And the tasks in Jira, would they have this description that's under the "Task" column? Is that where this pulled from to --
12:19 A. Yeah. It's probably -- it's probably a summary of, but -- let me see. Let me look at -- let me make this a little bigger. I'm sorry. One second. (Reviewing document.)
12:20 Some of them are the same and match up to

the task, and some of them are -- well, weekly calls -- yeah, they do -- they do match with Jira.

12:20 Q. Okay. So you just would consult with Jira and pull the tasks description out and the amount of hours that were recorded in there?

12:20 A. Correct.

12:20 Q. And it says -- in this column over here labeled "Billed Out," there's "yes" entered for it looks like all the -- almost all the tasks. There's one down here in row 97 that says "no charge."

12:20 A. Uh-huh.

12:20 Q. What -- what, I guess, tasks were billable, and which tasks were not billable?

12:21 A. So, I mean, that was on a case-by-case basis. And for the most part, it would be, you know, whatever -- you know, some things, we would have to go to management.

12:21 But, you know, I think I mentioned before that we would have to update the tasks with the client's name. That wasn't something that would be billable. Us spending time to copy our email strand into the task, that wouldn't be considered billable. If I was working with Trey on, you know, understanding something so that he could train or meet with the client, that wouldn't be considered billable. The checklist I put together to

assist him on knowing what to do and when, that wasn't billable.

Q. And so was it something you just kind of used your judgment on as to whether to bill it or not?

A. Between myself and -- and Jamie, we -- we would have conversations about, you know -- yeah, like, you know, what are some of the issues that we're seeing and, you know, go back and forth about, you know, what we can do to help.

Q. So the entry in here that wasn't billable --

A. Uh-huh.

Q. -- it looks like "internal discussion regarding export change needed" --

A. Uh-huh.

Q. -- would that have been recorded in here as well, and then you, after discussing it with Jamie, would come back and mark it as nonbillable?

A. Yes.

Q. And was the purpose of maintaining this document so you could tell how much billable time the client had left for their implementation?

A. Yes.

Q. If we look up at the top of this document, it looks like they had purchased 80 hours, and they have just under five hours remaining?

12:23 A. Yes.

12:23 Q. What -- I think we talked about this earlier, but just to make sure, what happens if they run out of time?

12:23 A. Management would, you know -- we -- management would pretty much assess what's remaining or what's left to be completed in the implementation. In some cases, they would create a -- I forgot the acronym that they use, but it was pretty much a nonbillable task just to kind of get the project complete. But if it was a substantial amount of time that would be needed, then management would, you know, reach out to sales and request a change order for additional hours or give us approval to request additional hours.

12:23 Q. Okay. And that would all be triggered by, I guess, once you have updated this tab or this spreadsheet tab and finding out that they're out of hours?

12:24 A. Well, we -- I mean, I would probably touch every project almost daily -- if not daily, every other day -- just because there's so many things going and so many people pulling from the budget. So, you know, you pretty much had to stay on top of that.

12:24 So, typically, once I saw the client got down to a certain number of hours, maybe 15 or 20, I

would assess and then start those conversations with management.

12:24 Q. And it looks like here maybe there was some time that was compensated with -- that you had spent with Hillary?

12:24 A. Yes.

12:24 Q. And what would that have related to, if you recall?

12:24 A. I don't. I don't know.

(Exhibit 6 marked.)

12:25 Q. Okay. I've shared with you what will be Exhibit 6. Do you have that in front of you, Ms. Harrison?

12:25 A. I do.

12:26 Q. Let's go over to this implementation timeline tab. Is this another example of an implementation project plan or a timeline that you would have created as a project manager?

12:26 MR. HERRINGTON: Amanda, I'm going to interrupt you for just a moment. Will you clarify for me whether the spreadsheets that you're introducing as exhibits, whether all of the tabs within it constitute the exhibit or -- you know, or just what you've shown in the video?

12:26 MS. BROWN: I was contemplating the entire

document. I mean, if you want me to go back and click through each tab, I can.

12:26 MR. HERRINGTON: I just want to make sure that we're all on the same page about, you know, if -- if one tab in the PD- -- or in the Excel spreadsheet has been introduced, that -- that when the exhibits are created in PDF for the transcript, that the entire contents will be included.

12:27 MS. BROWN: Yeah, yeah, that's what I was contemplating. It's going to be -- you know, PDF in Excel is always difficult. So we can certainly produce these to you guys natively too if you have them.

12:27 MR. HERRINGTON: Okay. Thank you.

12:27 Q. So going back to Exhibit 6, Ms. Harrison, I believe the question I had asked was whether this was another example of a project -- or an implementation project plan or timeline that you had created while you were a project manager.

12:27 A. Yes. This would be one that I also updated, yes.

12:27 Q. I'm sorry. I couldn't hear you. What did you say?

12:27 A. It is.

12:27 Q. And it looks like this one has a "Go Live Checklist" tab.

12:27 A. Uh-huh.
12:27 Q. And we referred to that earlier. Is that right? This is the document you referred to saying that you would have to populate this to ensure that a client was ready to go live?
12:28 A. Yes.
12:28 Q. And these are all the different tasks that they would have gone through before they could go live?
12:28 A. Correct.
12:28 Q. And it looks like it has an area for the project manager's signature?
12:28 A. Yes.
12:28 Q. So would you sign off on this go-live checklist?
12:28 A. In most cases, we -- we wouldn't. So that project manager's signature would be the client's sign-off saying that those tasks had been completed and that they had been trained.
12:28 Q. Okay. So the client has their own project manager?
12:28 A. I'm sorry. Say that one more time.
12:28 Q. No, I didn't mean to interrupt you. I was just trying to understand. So there's -- I guess the project manager on Tyler's side is you, and then the client would also have their own project manager?

12:28 A. Oh. Yes. Yes, yes, yes. That is correct. We would be -- there would be a project manager assigned on the client's side as well.

12:28 Q. Okay. And that's who this contemplates signing?

12:29 A. Yes. There is a place for both project managers to sign, but typically we would -- we would not print these off and sign off on them and store them anywhere, from what I recall. I don't -- I don't recall ever signing a checklist.

12:29 Q. And then going over to this implementation project plan tab, this one looks a little different than the one we just looked at as Exhibit 5 in the sense that this one has more implementation team entries than Exhibit 5 did.

12:29 A. Uh-huh.

12:29 Q. Do you -- do you have an understanding of why different client resources were allocated on different implementation timelines?

12:29 A. Yeah, the only thing I could -- only other thing I could think of is whenever Trey's start date was, and maybe he wasn't, you know, well versed in doing some of those tasks, so I had to fill in for him, because that -- that was the case. There was times where I'd travel on-site for him and -- et cetera. So

that's the only scenario I can think of. I'm not sure when he started, but that could be the case.

12:30 Q. So sometimes, depending on the resources that you had available to you, you kind of had to modify this implementation timeline to reflect --

12:30 A. Yes.

12:30 Q. -- the resources available?

12:30 A. Right, correct.

12:30 Q. And then it looks like here there's an "Implementation Services" tab. And that, again, would contain the time spent or reported for this implementation?

12:30 A. Of the billable portion, yes.

12:30 Q. And it looks like there was a division of tasks between yourself and Trey?

12:30 A. Correct.

12:30 Q. And do you recall, I guess, approximately how long Trey was the implementation consultant you worked with?

12:31 A. I don't even know. I don't know that -- Trey might have been there a year, maybe a year and a half. I don't recall exactly. But I will say that Trey was my first IC once they split those positions, so ...

12:31 Q. Okay. And you think he was there for about one year?

document.) Okay. (Reviewing document.) All right. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) All right.

12:37 Q. That's the end of it. Do you recognize Exhibit 7?

12:37 A. I do.

12:37 Q. And is this an email chain between you and the client regarding updating the client's implementation timeline?

12:37 A. Yes.

12:37 Q. And it looks like -- down to the bottom where you initially emailed the client, you say, "Attached is an updated copy of the Implementation Timeline and below are the changes made."

12:37 What changes were you making to this implementation timeline?

12:37 A. I mean, it sounds like there was some misunderstanding as to what phase of the implementation the client was on. I probably had had a call with Brian, and so we were updating actual dates as to when they parallel test versus go live.

12:38 Q. And do you recall how you were alerted to the issue with, I guess, the misunderstanding as to the phases?

12:38 A. I do not.

12:38 Q. And when you updated this timeline to, I guess, clarify the phases as to when they test and go live, is that something that you had to provide management before you did?

12:38 A. Yes.

12:38 Q. And what did that look like? Did you just shoot an email to Hillary or Jamie and say, you know, I'm updating to clarify the confusion on the implementation phases?

12:38 A. Yes, that appears to be how I addressed it.

12:39 Q. And so is this email at the top here to Jamie regarding a new timeline based on information Brian gave -- is this you asking or, I guess, letting Jamie know that you'd made the update?

12:39 A. Yes. We likely already talked about it. Like I said, we would touch base often, and so we would talk through things that we ran into such as this. And once I made the change, I likely emailed Jamie to let her know.

12:39 Q. So you would have told her, you know, something along the lines of there is some confusion, it sounds like, with the phases of the implementation; I'm going to update the implementation timeline; and she would have said, like, okay; and then you would have gone and done it?

12:39 A. I don't know that it would have gone that smooth. She would have wanted to know why; you know, what the issues were; is it on our end; is it the client's end; is it something that, you know, we dropped the ball on. There would be more in-depth conversation about -- as -- you know, as to why the go-live date is being moved.

12:40 Q. Okay. So you'd have to answer some questions for her as to why the go-live was being moved?

12:40 A. Yes.

12:40 Q. And was -- moving the go-live date, was that considered a significant change?

12:40 A. Yes.

12:40 Q. And why is that?

12:40 A. I can't answer why, but we were asked to report those changes to management.

12:40 Q. Were there other changes to the implementation timeline that you didn't have to report to management?

12:40 A. Only if -- you know, if there was a conflict. Someone's not available, to a date-change move, or, you know, something's not being completed, you know, based on the time frame that I'm asking it to be done.

12:41 Q. So if there were conflicts or date changes or something not being completed, those were areas you had to run by the -- had to run by management?

stayed within budget, correct?

A. Correct.

Q. How did you do that?

A. Just by managing the budget. You know, frequent check-ins with the IC.

Q. So it would be using that kind of tracker that we looked at as part of the implementation timeline and then frequently checking in with the IC about the hours that they were spending?

A. Right, and reviewing Jira tickets.

Q. And then if the project was getting close to, like, exhausting the allotted hours, would you talk to the implementation consultant about making sure that they were careful with the hours they were billing?

A. Yes.

Q. Did you ever have a situation where you would look at a Jira ticket and see how much an implementation consultant had billed to a client and it didn't seem correct to you?

A. Yes.

Q. What would happen in that situation?

A. There would be internal conversations with management as well as the implementation consultant.

Q. So you would escalate that to management to address?

12:47 A. Yes.
12:47 Q. And in some instances, would that time be written down or written off?
12:47 A. I mean, if we found it justifiable for whatever reason, then, no, it wouldn't. We -- you know, we would just kind of roll with it and manage things going forward. And then in some instances, yes, NB tasks would be created, and the IC would be told to report the next hour to whatever -- to that NB task to kind of balance things out.
12:47 Q. And when you were looking at the tickets and you would see one where maybe the hours didn't seem right, is that just based on kind of your experience with these implementations, knowing how long it takes to do certain tasks?
12:48 A. Yes.
12:48 Q. How were the different implementations assigned to project managers?
12:48 A. Through management. Management would get a project and assign it to whichever team had the bandwidth.
12:48 Q. How is -- if you know, I mean, how did they know what bandwidth different teams had?
12:48 A. I don't know. I mean, I know they knew how many projects -- projects each person had. There were

times where management would come and say, Hey, do you think you can take another one? But, for the most part, I mean, you had to take it.

12:48 Q. I think earlier you said you had, like, upwards of 20 projects at a time. Is that right?

12:48 A. About 23, uh-huh.

12:48 Q. Twenty-three. And was that typical for the other ExecuTime project managers?

12:49 A. No.

12:49 Q. How many did other ExecuTime project managers typically have?

12:49 A. I mean, some had as little as, you know, 12 or 13. I think Jessie Bell would probably be right up there with myself, where she would maintain, you know, anywhere from 18 -- 18 or 19 projects at a time.

12:49 Q. Do you have an understanding of why you had more projects than other project managers?

12:49 A. I mean, not really, outside of just having -- you know, being a senior project manager.

12:49 Q. So senior project managers handled more projects at a time?

12:49 A. Yes.

12:50 Q. And was that -- did you feel like you were able to handle more projects at a time because you were more experienced on the project -- or more experienced with

01:45 Q. More, like, substantively, what would that look like? Was it like this client isn't grasping something; I think they need, you know, more time, or they need to -- I don't know. You tell me. What kind of -- substantively would those, like, escalations to you look like?

01:46 A. Yeah, the request for more time; the request to move dates. Like I said, there -- you know, requests to -- you know, maybe the training was initially done remotely and it wasn't good for the end users and they wanted something, you know, on-site, a little bit more personable.

01:46 Q. Did you -- did they ever come to you with any, like, concerns about the budgeted hours for implementation?

01:46 A. Yes, if they felt they were --

01:46 Q. What would that --

01:46 A. -- getting close to the budget.

01:46 Again, just emails or verbal conversations so that I have what I need to understand, you know, why are we running into this -- you know, how did we get to a point we were reaching the budget, so that I could have those conversations with management.

01:47 Q. And then after you have a conversation with management, would you circle back with implementation

01:58 So was the idea there that if this was going to be shared with the implementation team as a whole, you would add the project manager duties to this document as well?

01:58 A. Yes.

(Exhibit 11 marked.)

01:59 Q. Okay. I've shared my screen, and you should have in front of you Exhibit 11. Do you see that there, Ms. Harrison?

01:59 A. I do.

01:59 Q. Okay. And let me know once you've had a chance to review it and if you need me to scroll down so you can see the remainder of the email.

02:00 A. (Reviewing document.) Okay.

02:00 Q. Let me scroll down for you.

02:00 A. (Reviewing document.) Okay. (Reviewing document.) Okay.

02:00 Q. All right. And Exhibit 11, do you recognize this as an email that you sent to Jamie Burns?

02:01 A. Yes.

02:01 Q. And this was sent to her on October 8th, 2019. And it looks like you are discussing Brian, one of the implementation consultants you worked with?

02:01 A. Yes.

02:01 Q. So it looks like you were planning to schedule

a meeting with Jamie to talk about Brian. And you said, kind of, We can still meet if you want, but it looks like you already went ahead and talked to him about feedback you had been getting? Is that right?

02:01 A. Yes.

02:01 Q. So what feedback did you provide to Brian?

02:01 A. At that time, you know, there were just complaints where the client felt like they knew more of the software than Brian. Some of the same issues that we were seeing with Trey, where things weren't being completed or followed through with.

02:02 Q. It looks like you told -- down in the third paragraph, you say, "I told him if there is anything I can do better to help him to let me know, even if that means scheduling more time with him."

02:02 So it looked like you were making yourself available to -- to Brian as a resource so he could try and improve his performance?

02:02 A. Correct.

02:02 Q. Did his performance improve?

02:02 A. Not while he was under -- under myself as far as being his project manager.

02:03 Q. Why were you sending Jamie this email about the feedback that you had given to Brian?

02:03 A. Jamie and I, as well as Hillary, had already

had conversation. They had gotten feedback as well.

02:03 Q. And what were the conversations you had had with Hillary and Jamie about Brian?

02:03 A. Just discussions on, you know, some of the things that clients were reporting back.

02:03 Q. Did you guys discuss what action should be taken?

02:03 A. I believe Hillary and Jamie did make -- make suggestions, but more so, just, you know, me making sure that -- or making sure that he understands he needs to, you know, communicate things, you know, with me as they come up so that we can address them together.

(Exhibit 12 marked.)

02:04 Q. All right. Ms. Harrison, I've shared with you what will be Exhibit 12. Do you see that in front of you?

02:04 A. I do.

02:04 Q. And go ahead and take a look at it. Let me know when you need me to scroll down so you can see the whole email.

02:04 A. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) All right, uh-huh.

02:07 Q. Do you recognize Exhibit 12?

02:15 Q. Yeah, that makes sense.

02:15 So Brian, that you're referencing in this sentence, that's the implementation consultant that we have been discussing earlier?

02:15 A. Yes, ma'am.

02:15 Q. Brian Ledbetter, I believe.

02:15 So were you having Brian work on some of the items that Suzi was having trouble completing?

02:16 A. Yes, during this time period. This was when Brian was stepping in to assist Suzi. I believe Suzi was out on leave.

02:16 Q. And then it looks like in this -- we'll scroll down -- Dearborn, Michigan -- or, sorry, Missouri, there is a second bullet. It says, "This clients weekly call wasn't on my schedule for yesterday 03/06 so I missed sitting in for this call even though it was in Hillary's recap to me about filling in for Suzi. I was wrapped up with working with Brian and it completely slipped my mind."

02:16 A. Uh-huh.

02:16 Q. Is this what you're saying where Suzi was out on leave, so you had taken over, I guess, her duties and were working with Brian on, I guess, kind of filling in for Suzi?

02:17 A. Yes.

02:19 Is it fair to say you were trying to help Suzi improve her performance?

02:19 A. Yes.

(Exhibit 14 marked.)

02:20 Q. Okay. I've shared with you what will be Exhibit 14. Let me know if you have that in front of you, and I can scroll through it so you can see the entire document.

02:20 A. I see it. I can see it. Oh, I'm sorry. You can scroll down. (Reviewing document.) Okay.

02:21 Q. So do you recognize Exhibit 14 as an email exchange between you and Jamie Burns about Brian Ledbetter's performance evaluation?

02:21 A. Yes.

02:21 Q. And Jamie was asking for you to give her your feedback on Brian that she could include in his performance evaluation?

02:21 A. Yes.

02:21 Q. I'm going to share with you the attachment to Exhibit 14, which is the Brian Ledbetter performance eval document.

(Exhibit 15 marked.)

02:22 Q. All right. Do you see that in front of you? We'll make that Exhibit 15.

02:22 A. Yes.

what was reported on that date, but ...

03:03 Q. And then it looks like for November -- the next week, November 4th, there were no hours recorded again. And then the following week was your last, I guess, week recording time, and it looks like you recorded 28.25 hours?

03:03 A. Uh-huh.

03:03 Q. Were there any sort of guidelines about how much time you were supposed to record per week?

03:03 A. Not per week, but for -- yes, we had quotas that we had to meet and the -- yeah, we had quotas that we had to meet.

03:04 Q. What were the quotas?

03:04 A. I'm trying to remember. For a project manager, I don't remember exactly. It was a certain number of days per month, but I don't remember the exact number.

03:04 Q. So it was not necessarily hours, but you had to have so many days a month of billable time recorded?

03:04 A. Yes, that's correct.

03:04 Q. How many hours per week do you estimate that you worked as a senior project manager?

03:04 A. Would you mind asking that one more time?

03:04 Q. Sure. How many hours per week did you estimate -- do you estimate that you worked per week as a senior project manager?

working 60 to 65 hours a week at Tyler, you also had a side business at World Ventures and then another side business with Gimmie A Squeeze and then also formed your nonprofit?

03:09 A. Yes.

03:09 Q. What would you estimate to be the job duties that took the majority of your time as a senior project manager?

03:10 A. Vamping up new hires, getting them prepared to be able to conduct trainings on their own, and helping them through understanding tasks and the timeliness of that.

03:10 Q. And how much of a percentage of your time would you estimate that that took up?

03:10 A. More than 50 percent of my day, on most days.

03:10 Q. Okay. And you said ramping up new hires. When you're referring to "new hires," is that implementation consultants and project managers?

03:11 A. More so, implementation consultants.

03:11 Q. But also some new PMs?

03:11 A. That is correct.

03:11 Q. And then second to the time you spent ramping up new hires to conduct trainings on their own, what would be the next responsibility you had that took up the most -- majority of your time or the most amount of

your time?

03:11 A. Sure. Creating implementation timelines and, you know, mapping out resources to complete the different -- the various tasks.

03:11 Q. When you say "mapping out resources," what do you mean by that?

03:11 A. Just, you know, reviewing their calendars and checking their availability to complete trainings and things.

03:12 Q. So this would be for the implementation consultants?

03:12 A. Yes, ma'am.

03:12 Q. And would this also include people from the development team or tech support as well?

03:12 A. Yes.

03:12 Q. And how much of your time would you estimate that you spent on that responsibility?

03:12 A. I'd say maybe 30 percent of my time.

03:12 Q. And then what would you say took up the remaining balance of your time, the 20 percent that's left?

03:12 A. You know, following up on support issues, issue resolution, transition to support calls, updating and managing, you know, Jira tickets, and doing the large amount of copy/pasting emails from -- you know,

copy/pasting emails and making sure that stuff's in Jira, and just kind of keeping up with those tasks in Jira to ensure that they're closed out and being handled in a timely manner.

03:13 Q. What about the time that you spent conducting training? Where would that fall?

03:13 A. Good question. I would say issue -- you know, along with the issue resolution and stuff, because typically the only time I was pulled in to conduct training is when there was an issue with the original trainer.

03:14 Q. So that would fall into the 20 percent category?

03:14 A. Yeah, give or take, uh-huh.

03:14 Q. Then what about conducting calls with clients?

03:14 A. I guess that would fall in with the whole, you know, managing of the project. The budget, timelines, you know, communication with management as to where projects stand.

03:14 Q. That would be that second category, 30 percent?

03:14 A. Correct.

03:14 Q. When you said ramping up new hires and conduct training on their own took about 50 percent of your time, what all went into ramping up new hires?

03:14 I know we've talked about the feedback

that you would provide, listening to calls that they would conduct. What else would go into that?

03:15 A. Spending one-on-one time with them; you know, training them on the application to increase their knowledge; you know, assisting them with troubleshooting issues with support that they'd run into that I'm not able to, you know, address right off the bat; creating cheat sheets, just Word document cheat sheets to help them, you know, stay organized and keep up with action items that came up to ensure they follow up.

03:15 Q. So would that be similar to kind of the summary and checklists that you had -- that we saw earlier where you'd list out each project and kind of where it was and what you expected from the IC with respect to that project and -- something like that?

03:16 A. Yes, ma'am.

(Exhibit 18(A) marked.)

03:16 Q. All right. Ms. Harrison, I've shared with you what will be Exhibit 18(A). Let me know if you've got that up in front of you and when you need me to scroll down so you can see the entire document.

03:16 A. Okay, I'm ready.

03:17 Q. Did it freeze for you? It froze on my end.

03:17 A. Yes, it is frozen.

03:17 Q. There we go.

03:19 Q. And this is the application that you completed for the implementation analyst role?

03:19 A. Yes.

03:19 Q. How did you learn about the role being available?

03:19 A. Talent would send out weekly, and even sometimes multiple times a week, available job opportunities.

03:20 Q. So you saw this in an internal job email alert and decided it was something you'd be interested in?

03:20 A. Yes.

03:20 Q. And what did the application process entail?

03:20 A. I first had to get approval from my manager, and then you would just -- I think once you have that approval form, you would -- I believe I printed that out along with an updated copy of my résumé, and I emailed it to the HR person responsible for that position.

03:20 Q. And then did you have an interview?

03:20 A. Yes.

03:20 Q. Who interviewed you?

03:20 A. Kayla Wagner and Michelle ... I don't remember her last name, but she's Kayla's manager.

03:21 Q. Okay. And in Exhibit 19, you say, "My personal goal has been to obtain a position that allows me to help other PMs and potentially ICs with less experience

achieve some of same milestones."

So were you moving into the implementation analyst role with the idea that you would be able to help PMs and ICs with their implementation issues?

A. Yes.

Q. Then you also say, "Currently I have the most experience within my department and that had lead me to a place of wanted to do more for our entoral" -- "entoral teams" --

A. Yeah.

Q. -- "as I see so much growth opportunity" -- or -- "growth opportunity and potential within the team I'm currently working with."

So you were the most senior project manager on the ExecuTime team?

A. That's correct.

Q. So I guess based on this description that I'm reading, it sounds like the reason you wanted to move roles is you just wanted to be able to do more for supporting the implementation consultants and project managers? Is that fair to say?

A. I mean, what initially led me to start looking for other positions was the number of hours I was having to spend managing the number of projects that I had and not really, you know, getting what I needed from the

team to support the efforts that were going into my implementations.

03:23 I'd actually had, you know, conversations with our general manager in regards to, you know, being able to focus more on helping ICs and PMs rather than manage projects within the ExecuTime realm, but I was -- I was shut down, so I started seeking other opportunities.

03:23 Q. And who is the GM you had these conversations with?

03:23 A. His name was -- oh, my gosh. What was his name? Greg ... I can't think of his last name. But it was in verbal conversations. We had a couple of different meetings, and then also there was a recap email that was sent. His name's right -- Greg Savard. Sorry. Greg Savard.

03:24 Q. Savard, S-a-v-a-r-d?

03:24 A. You got it. Yes.

03:24 Q. And when did these conversations occur?

03:24 A. It would have been the earlier part of 2019, prior to me making the decision to explore -- you know, explore other opportunities.

03:24 Q. You said you began looking because of the number of hours and the, I guess, lack of support you felt you had in the project manager role.

03:28 A. Lawson (phonetic), Oklahoma.

03:28 Q. And you said the vice president of implementation services asked if you'd go.

03:28 Who is that, specifically?

03:28 A. Jennifer Turgeon.

03:29 Q. And what did you understand had happened that resulted in issues with the go-live date for that project?

03:29 A. The IC had went in there and ran an automatic integration -- I'm sorry. The payroll export. The automation of the payroll export was not working properly, and so the IC on that project made the decision to do a manual upload, and it blew up.

03:29 Q. And then what did you do to assist with the cleanup?

03:29 A. I had to travel out there. They wanted me there Monday morning, so I drove out there Sunday. And hosted multiple training sessions. You know, it -- it ended up being a lot more than what was initially discussed. It wasn't just a matter of fixing their payroll export stuff. It was reconfiguring ExecuTime in a lot of areas so that the calculations were being correctly handled.

03:30 Q. So what did you do to reconfigure ExecuTime?

03:30 A. So I, you know, trained -- you know, worked

with the team there at Lawson and trained them on their options on handling different things. They had a lot of overtime rules that were misfiring and not calculating overtime correctly, putting the overtime on the wrong week. So we corrected -- you know, manually corrected the overtime configurations.

Same thing with shift differential. There were situations where shift differential should have been paid but it wasn't, vice versa.

So I just worked with the team on identifying, you know, those issues and reconfiguring the rules that had been previously set up.

Q. And do you know why Jennifer came to you to ask for you to do this?

A. I don't. I don't recall.

Q. Had you been involved in that project before?

A. Yes, yes.

Q. How long were you on-site?

A. One week. From Sunday to Saturday.

Q. And were they able to successfully go live at the end of the week?

A. They were definitely in a much -- a much better position, yes. They were able to, you know, cut checks to their employees. And the situation was so bad that, you know, like, people that have child support and other

things that come out of their paycheck didn't calculate.
03:32 So by the time I left, they were able to generate those checks to send to the parents and -- yes, I don't know that they actually officially -- well, I guess, yeah, they were still considered live, so, yes. I'm sorry. There was just a lot of manual work for multiple pay periods to keep them live.
03:32 Q. And who was the project manager on that project?
03:33 A. Bobbi Davis. Bobbi, B-o-b-b-i. Last name, Davis.
03:33 Q. And you said you traveled to project management summits in Austin. Were these just kind of like conferences for different employees?
03:33 A. Yes, they were. We had stations set up and -- you know, based on the type of employee, yes.
03:33 Q. And how long did those conferences last?
03:33 A. Three days.
03:33 Q. Did other implementation analysts attend those conferences?
03:33 A. Not that I'm aware of. None from my team. I don't know of any other team.
03:34 Q. Were these conferences that you were invited to or conferences that you asked to go to?
03:34 A. Conference that I was invited to, and I was --

I was asked to do --

03:34 Q. Who invited you?

03:34 A. -- a presentation.

03:34 Kayla Wagner.

03:34 MR. HERRINGTON: Amanda, whenever it's good for you, I'd like to take a brief, five-minute restroom break.

03:34 MS. BROWN: Yeah. Let me just get through this, and then we can. Almost there.

03:34 MR. HERRINGTON: Okay.

03:34 Q. You said you presented at those conferences?

03:34 A. Yes. I had a small segment where I did a quick, 30-minute, you know, "Here's what's new with ExecuTime" type presentation.

03:35 Q. And who would you be presenting to? Who was the audience for that?

03:35 A. Other Tyler project managers.

03:35 Q. You'd be educating project managers on new features with ExecuTime?

03:35 A. That's correct.

03:35 Q. And would you -- did you put together, like, PowerPoints for these presentations?

03:35 A. I did not. The presentation was provided to me.

03:35 Q. Who provided it to you?

03:35 A. Kayla Wagner.

03:35 Q. Did you make any changes to the presentation?

03:35 A. Not that I recall.

03:36 Q. You said you traveled to Maine a couple of times to conduct ExecuTime trainings for ICs and PMs there.

03:36 Tell me about the training that you provided in Maine.

03:36 A. It was classroom style. I would have my laptop hooked up to a projector, and I was -- well, I'm sorry. The first training that I attended, I literally flew out there my first day in that role, and I observed Kayla conducting the ExecuTime training.

03:36 And then the next time they flew me out there, I conducted the training. It was classroom style, just going through the ExecuTime application, set up basic users, you know, how supervisors use the system, that type of thing.

03:37 Q. So were you teaching, I guess, implementation consultants and project managers how they would configure ExecuTime?

03:37 A. Not really. More so just showing them what's available. The majority of those users that attended that, they've already seen and trained on ExecuTime in some capacity. And so it was more just a way -- an

opportunity for them to address questions, us to discuss issues that they are running into, that type of thing.

03:37 Q. And you were able to, I guess, have these kind of trainings and answer these questions based on your experience with ExecuTime?

03:37 A. Yes.

03:37 Q. Were there any other implementation analysts for the ExecuTime product?

03:37 A. No, not at the time that I was there, no.

03:38 Q. And the implementation analyst position, was that a new role at Tyler when you applied for it?

03:38 A. Yes.

03:38 Q. And did you have any discussions with Kayla or anyone during the application process about why that role had been created?

03:38 A. I mean, she may have told me why it was created, but -- but, no, I didn't inquire as to why.

03:38 Q. Did you have an understanding of why the company had created that role?

03:38 A. I understood the need for it, yes.

03:38 Q. What did you understand the need for that role to be?

03:38 A. Just to, you know, assist all of the Tyler PMs and ICs with implementations that they were taking on for ExecuTime.

03:40 Off the record at 3:40 p.m.

(Recess taken from 3:40 to 3:49.)

03:49 THE VIDEOGRAPHER: Back on the record, 3:49 p.m.

(Exhibit 20 marked.)

03:49 Q. All right. Ms. Harrison, I've shared with you what will be Exhibit 20. Do you see the document in front of you?

03:49 A. I do.

03:49 Q. And let me know after you've had a chance to review it or if you need to scroll down.

03:49 A. Okay. (Reviewing document.) Okay. (Reviewing document.) Okay. (Reviewing document.) Okay.

03:51 Q. Is Exhibit 20 an accurate description of the implementation analyst job duties?

03:51 A. Yes.

03:51 Q. Did you say "yes"?

03:51 A. Yes.

03:51 Q. Sorry. Didn't hear you.

03:51 So on the second bullet point down, it says, "Provide leadership in the creation of 'best practice' templates, process improvements and knowledge transfer materials."

03:51 Do you see that?

03:51 A. Yes.

03:51 Q. So tell me a little about -- what "best practice" templates were you creating?

03:52 A. I don't recall creating any.

03:52 Q. What about "process improvements"? Do you recall working on any process improvements as an implementation analyst?

03:52 A. No.

03:52 Q. And what about knowledge transfer materials?

03:52 A. Yes.

03:52 Q. What knowledge transfer materials did you create?

03:52 A. So out on SharePoint, it was just quick how-tos as far as configuration, how to set up a specific type of pay code, accrual code combination. I documented the Jira tickets that I worked to ensure, you know, whatever steps were taken to resolve the issue were noted. And then I created knowledge base standard -- "KBS articles" is what we referred to them as.

03:53 Q. KBFRs?

03:53 A. Articles.

03:53 Q. Oh, KB --

03:53 A. KBS.

03:53 Q. -- articles?

03:53 A. Yes, ma'am.

03:53 Q. What were those?

03:53 A. They were just quick knowledge base standard forms, that we -- you know, we take the information from the ticket we were working and basically just transfer what the question was and what we did to resolve that issue.

03:53 Then that was made accessible to internal teams as well as clients so that they can, you know, check that database before they report an issue to see if there's already a resolution out there.

03:54 Q. Okay. So you would be putting together stuff kind of based on your experience or the issues you were seeing, and then --

03:54 A. In support.

03:54 Q. -- the ICs or PMs could use that to resolve issues that they were encountering with an ExecuTime implementation?

03:54 A. Yes.

03:54 Q. There's a bullet point that says, "Provide non-billable informational sessions by webinar to implementation consultants or their clients."

03:54 Do you recall informational sessions that you -- or webinars that you participated in?

03:54 A. Yes.

03:54 Q. Can you tell me about those?

03:54 A. Sure. Just, you know, as I'm working a ticket,

and then also being on-site. I don't know what percentage that would be.

04:24 Q. What would you say took up the majority of your time as an implementation analyst?

04:25 A. Caseload. The number of cases that were coming in from the project managers and IC, as well as the number of cases that were existing at the time I joined the team.

04:25 Q. And that would be in the form of either the CRM tickets or I- -- ICs and PMs reaching out to do team meetings? That is kind of what you mean by "caseload"?

04:25 A. Yes, ma'am.

04:25 Q. And how much of your time would you say that took up?

04:25 A. More than a hundred percent.

(Exhibit 24 marked.)

04:26 Q. Okay. Ms. Harrison, I've introduced what will be Exhibit 24.

04:26 A. Okay.

04:26 Q. Do you have that in front of you?

04:26 A. I do.

04:26 Q. And are you familiar with Exhibit 24? Bigger for you.

04:26 A. Oh, thank you. Yes, I am familiar with it.

04:26 Q. And is Exhibit 24 the alternative work schedule

evaluation you received at the end of 2020 for the implementation analyst role. Correct?

A. Uh-huh, yes.

Q. And here -- so this would have been from Kayla?

A. Correct.

Q. And did you meet with her to go over these performance reviews?

A. Yes.

Q. It says here under "Knowledge Transfer," "Talia was able to transfer her knowledge in multiple ways, including KCS articles, Confluence page creation/updates, OE sessions and 'ExecuTime 101' training sessions."

I know we talked about those Confluence page creation/updates. And I think you mentioned the KCS articles, but I wasn't quite sure what those are. Can you tell me a little bit more about what those are?

A. Sure. I think I was referring to them as "KBS" articles. That's my apologies for that. But those are the just -- quick articles that we would create for the ICs, project managers, as well as our clients. We would make them client facing for them to quickly troubleshoot issues.

So they could search an error message on our KCR -- KCS articles, and if it's something that was

reported and an article was created, it would come up and usually produce steps to resolve that issue or give them knowledge of the fact that it's a known issue and when it's expected to be corrected.

04:35 Q. What about "OE sessions"?

04:35 A. "OE sessions"? Those are the -- me going to Maine to conduct ExecuTime training sessions.

04:35 Q. What does "OE" stand for, if you know?

04:35 A. Ongoing education.

04:35 Q. And what about the "'ExecuTime 101' training sessions"?

04:35 A. I'm not really sure what that -- I believe that that's going to be -- that was, you know, just me meeting independently with PMs or ICs as they reported issues, and training them, you know, on -- wait. Sorry for the noise, if you can hear that in the background.

04:36 There were forums that I would have to host, like, just quick, 30-minute to an hour forums that would take place every quarter. And during that forum, we would come up with content that would need to be discussed on that forum. Usually it's new functionality or, hey, this is what's new on our analyst Confluence page, that type of thing.

04:36 Q. So they're kind of educational events?

04:36 A. Yes, ma'am. Uh-huh.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

TALIA N. HARRISON, *
*
Plaintiff, *
*
vs. * No. 4:21-cv-00607-ALM
*
TYLER TECHNOLOGIES, INC., *
*
Defendant. *

****
REPORTER'S CERTIFICATION
ORAL AND VIDEOTAPED DEPOSITION OF
TALIA N. HARRISON
JANUARY 19, 2022
****

I, LEAH K. OSTEEN DOW, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, TALIA N. HARRISON, was duly sworn by me and that the transcript of the oral deposition is a true record of the testimony given by the witness;

I further certify that pursuant to FRCP Rule 30(f)(1) that the signature of the deponent:

_XX__ was requested by the deponent or a party before the completion of the deposition and is to be returned within 30 days from date of receipt of the transcript. If returned, the attached Errata contain

any changes and the reasons therefor;

____ was not requested by the deponent or a party before the completion of the deposition.

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys to the action in which this proceeding was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor am I financially or otherwise interested in the outcome of the action.

Ms. Brown - 6 hours, 23 minutes

Mr. Herrington - 0 hours, 12 minutes

Subscribed and sworn to on this the 26th day of January, 2022.

Leah K Osteen
____
LEAH K. OSTEEN DOW, Texas CSR #[illegible]
Certification expires: 4/30/2023
Firm Registration No. 392
Osteen & Associates Reporting Services
313 Northglen Dr.
Hurst, Texas 76054-3024
(817) 498-9990
osteenreporting@gmail.com

EXHIBIT
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Talia Harrison

100 Park Drive #434 Maumelle, AR 72113 Phone: 501-412-4665
TaliaNacoleHarrison@gmail.com

Persistent and highly enthusiastic professional consisting of 11+ years of diversified experience with proven ability to contribute to ever changing initiatives while maintaining a focus on established goals. Demonstrated ability to teach, coach and develop teams, while remaining passionate in impacting performance internally & externally. Dedicated with motivation to maintain and contribute to team & organization wide success. Consistently function with the highest level of integrity while influencing peers to do the same.

CAPABILITIES INCLUDE:

• Leadership & Mentorship •Business Process Improvement • Training

•Conflict Resolution • Positive Client Relationship Management

PROFESSIONAL EXPERIENCE

Senior Project Manager, Tyler Technologies – ExecuTime Software
09/13– ***present***

- Works directly with client Stakeholders, sales and technical staff to ensure project responsibilities are thoroughly and precisely defined as well as documented
- Successfully implemented 50+ ExecuTime Time & Attendance implementations including The City of Muskogee, OK whom agreed to a press release
- Works directly with enterprise-level clients to ensure effective setup and support
- Maintains and circulates user administrative documentation for internal/external use
- Maintains client-specific notes and documentation regarding all interactions and issues to facilitate future client interactions
- Estimates and plans projects from start to finish, with built-in contingencies
- Manages, monitor and motivates the cross functional team assigned to each project
- Trains enterprise-wide on time and attendance application to end users/supervisors ranging from entry-level staff to senior executives.
- Coordinates with Payroll and HR management to ensure strict deadlines were met for a smooth, manageable transitions
- Creates and delivers customized ExecuTime client training sessions via the web and/or on-site visits to ensure client satisfaction and product knowledge.
- Conducts trainings for Subject Matter Experts and demonstrated new product functionality for clients as well as internal staff (new & existing)
- Continuously consults with Stakeholders regarding their specific company operations in order to recommend best utilization and customization of ExecuTime configuration
- Responsible for completion of projects on time, on budget and on specification. Performs a variety of tasks including, but not limited to, scheduling all resources; setting deadlines;

assigning responsibilities; and monitoring, summarizing and communicating the progress of the project.

- Ensures all customer communications are handled in a polite and professional manner
- Efficiently and competently manages problems, changed requirements, missed deadlines, etc
- Schedules resources for each project and ensured resources are sufficient
- Assists with onboarding process for new hires through recruiting, interviewing and hiring
- Lead and advocated for overall resolution of customer incidents and problem management
- Continuously strived to promptly communicate incident status to customers and internal staff
- Analyzed, provided recommendations, documented and tested system feature enhancement with Tyler-ExecuTime Director of Product Strategy & Operations
- Identified and escalated incidents to development and/or management when needed
- Analyzed, recommend and document system development priorities for new ExecuTime features and change requests submitted by customers
- Worked with development staff to ensure deadlines are established and met for customer incidents; efficiently
- Responsible for identifying and analyzing user requirements, procedures, and problems to improve workflow
- Conducted onsite analysis for the City of Buffalo, NY Public Safety in an effort to assist the Executive Sales team with sales lead
- Assists sales team as aid during multiple sale demos onsite as well as over the phone.
- Travels to perspective clients to perform analysis on internal practices & filter questions/concerns directly related to ExecuTime Software.
- Managed and maintain daily work completion report per trainer to asset daily productivity

Training Manager, *MedEvolve, LLC*
05/2006-09/2013

- Coordinate and schedule new install training
- Assign trainers to new installs
- Create and manage training schedules for employees
- Distribute daily workload
- Coach and provide feedback to employees regarding productivity and performance
- Provide feedback to managers and sales representatives regarding employee and customer concerns
- Develop training materials for process changes/ updates
- Conduct monthly evaluations so that performance can be reviewed, and assistance can be given in the areas needed
- Receive, document, and distribute customer concerns and create corrective action plans in order to resolve issues
- Conduct training for new and existing employees
- Conduct training for clients via phone, internet and onsite
- Conduct System Verifications (Assess how Medical Practice runs day to day operations)
- Follow-up Client Training
- Liaison between Client and Implementation Coordinator as well as EDI Specialist
- Training Mentor to Junior Trainers
- Perform Quality Assurance of new and revised reports for Development
- Creation and publication of training manuals
- Assessment of existing clients to ensure all training has been conducted
- Provide technical support to trainers while onsite
- Developed, implemented and maintained Webinars

Software knowledge:
SQL, Outlook, Office365, CRM, Salesforce, AS400, GoToMeeting/GoToAssist, Confluence, JIRA, Concur Solutions & varies VPN providers

References **References are available on request**.

EXHIBIT
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1/19/22 Harrison Rptr: LO

PALM DESERT, CA & EXECUTIME - IMPLEMENTATION PROJECT PLAN

	PROJECT TASKS	EXECUTIME RESOURCES	CLIENT RESOURCES	ONSITE / REMOTE	STATUS	TARGET DUE DATE	ACTUAL COMPLETION	ADDITIONAL NOTES
TIMEKEEPING DESIGN	Welcome Packet provided to client	Pro Services Cord.	Project Manager	Remote	Complete	5/8/2017	5/8/2017	
	Questionnaire /Agenda Provided to client	Pro Services Cord.	Project Manager	Remote	Complete	5/22/2017	5/18/2017	
	Stakeholder Kick Off Meeting	Project Manager	Implementation Team	Remote	Complete	6/14/2017	6/14/2017	Scheduled for 6/14 @ 8:30am
	Project Plan Timelines Finalized	Project Manager	Project Manager	Remote	Complete	7/21/2017	9/5/2017	9/1/2017 - Sent updated PP.
	*****Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Complete	7/21/2017	9/5/2017	*See "Milestone Acceptance" tab*
	Completed Questionnaire returned To ExecuTime	Project Manager	Implementation Team	Remote	Complete	6/30/2017	7/5/2017	
	Questionnaire Review Meeting with client	Project Manager	Implementation Team	Remote	Complete	7/7/2017	7/6/2017	
	Hardware & Integration Planning	Project Manager	Implementation Team	Remote	Complete	7/7/2017	7/5/2017	
	Creation of Solution Design & Scope of Work	Project Manager	Implementation Team	Remote	Complete	7/14/2017	7/11/2017	7/11 - 1st draft sent. 7/14- 2nd draft sent. 7/18 - 8/30 - SD check-ins. Signoff provided on 8/30.
	Signed & Approved Solution Design Document	Project Manager	Implementation Team	Remote	Complete	7/21/2017	8/30/2017	
	*****Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Implementation Team	Remote	Complete	7/21/2017	8/30/2017	*See "Milestone Acceptance" tab*
HARDWARE / INTEGRATION	Completed VPN Document	Project Manager	IT Dept	Remote	Complete	6/30/2017	7/5/2017	See "Connectivity" tab-client will complete
	Completed Connectivity Documentation	Project Manager	IT Dept	Remote	Complete	6/30/2017	7/5/2017	See "Connectivity" tab-client will complete
	Test connectivity to Payroll Server	Project Manager	IT Dept	Remote	Complete	7/7/2017	7/7/2017	7/7 - Successfully able to ping Payroll Server.
	Test remote connectivity to client Server	Technical Team	IT Dept	Remote	Complete	7/7/2017	7/6/2017	
	Verify minimum hardware specs are met	Project Manager	IT Dept	Remote	Complete	7/7/2017	7/7/2017	Not applicable for Cloud clients
	Application server install	Integration	N/A	Remote	Complete	7/14/2017	7/11/2017	Scheduled w/ TSM OSDBA Team
								Solution Design sign-off provided on 8/30/2017. 9/1 - Updated PP provided; *all dates changed from this point.*
	Dept, Employee, Benefit Accrual Query	Integration	N/A	Remote	Complete	7/14/2017	9/5/2017	Sungard OneSolution. 9/1 & 9/5 - Reached out for dept. info again.
	Dept, Employee, Benefit Accrual Integration Programs	Integration	N/A	Remote	Complete	9/12/2017	9/14/2017	
	Project Costing Query	Integration	N/A	Remote	Complete	9/6/2017	1/12/2018	7/11 - Requested by 7/21. 10/16- sent project.csv again to acquire info.
	Project Costing integration programs	Integration	N/A	Remote	Complete	9/12/2017	1/28/2018	
	*****Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Complete	9/12/2017	1/12/2018	*See "Milestone Acceptance" tab*
	System Integration Signoff & Acceptance	Project Manager	Project Manager	Remote	Complete	9/19/2017	9/20/2017	
	*****Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Complete	9/19/2017	9/20/2017	*See "Milestone Acceptance" tab*
	Power User Training Session (Part I)	Project Manager	Implementation Team	Remote	Complete	9/29/2017	9/27/2017	**Scheduled for 9/27/17.** See "Trainings" tab
	Power User Training Session (Part II)	Project Manager	Implementation Team	Remote	Complete	9/29/2017	9/29/2017	**Scheduled for 9/29/17.**
	Power User Training Session (Part III)	Project Manager	Implementation Team	Remote	Complete	9/29/2017	10/16/2017	**Scheduled for10/16/17.**
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Complete	9/29/2017	12/14/2017	*See "Milestone Acceptance" tab*

PALM DESERT, CA & EXECUTIME - IMPLEMENTATION PROJECT PLAN

	PROJECT TASKS	EXECUTIME RESOURCES	CLIENT RESOURCES	ONSITE / REMOTE	STATUS	TARGET DUE DATE	ACTUAL COMPLETION	ADDITIONAL NOTES
TRAININGS AND CHECKLIST								*Slight project delay (10/16- 11/15) 11/15 - email to get project back on track. 11/29 - Provided updated project plan. Pending Acceptance. Additional project delay (11/16- 12/29). 12/29 - Hillary emailed to get project back on track, and provided additional updated PP.* *1/31/18- Provided Final Updated PP*
	Production Go Live Planning	Project Manager	Implementation Team	Remote	Pending	10/12/2018	TBD	
	Power User/System Admin Checklist	Project Manager	Implementation Team	Remote	Complete	4/11/2018	4/11/2018	**Original due date was 10/13/2017. Updated due date was 12/22/2017. 1/31 *Due date: 2/9/18**
	End User Training-Timekeeping	Project Manager	Implementation Team	Remote	Complete	5/10/2018	5/10/2018	See "Trainings" tab - Train the trainer format
	Super User Training-Timekeeping	Project Manager	Implementation Team	Remote	Complete	5/10/2018	5/10/2018	See "Trainings" tab - Train the trainer format
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Complete	10/26/2018	10/26/2018	*See "Milestone Acceptance" tab*
	End/Super User Training Checklist	Project Manager	Implementation Team	Remote	Complete	10/26/2018	10/26/2018	See "Go Live Checklist" tab
	Payroll Export Training/Test	Project Manager	Payroll Team	Remote	Complete	5/24/2018	5/24/2018	See "Trainings" tab
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Complete	10/26/2018	10/26/2018	*See "Milestone Acceptance" tab*
PAYROLL	Payroll export integration programs	Project Manager	N/A	Remote	Complete	10/10/2018	10/10/2018	
	Apply and Test Payroll export (internal)	Project Manager	N/A	Remote	Complete	10/10/2018	10/10/2018	
PILOT TESTING	Identify employees who are in pilot test	Project Manager	Project Manager	Remote	Complete	9/8/2017	9/13/2017	
	Establish pay period dates for pilot test (#1)	Project Manager	Project Manager	Remote	Complete	9/8/2017	9/5/2017	
	Establish pay period dates for pilot test (#2)	Project Manager	Project Manager	Remote	Complete	2/2/2018	2/2/2018	
	Launch pilot testing for 1st full pay period	Project Manager	Project Manager	Remote	Complete	3/3/2018	3/3/2018	Pay Period Test #2: 3/3 - 3/16.
	Client sign off on pilot test #1	Project Manager	Project Manager	Remote	Complete	3/21/2018	3/21/2018	Export: 3/21/2018
	Launch pilot testing for 2nd full pay period	Project Manager	Project Manager	Remote	Complete	3/17/2018	3/17/2018	Pay Period Test #2: 3/17 - 3/30.
	Client sign off on pilot test #2	Project Manager	Project Manager	Remote	Complete	4/4/2018	4/4/2018	Export: 4/4/2018
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Complete	4/4/2018	4/4/2018	*See "Milestone Acceptance" tab*

PALM DESERT, CA & EXECUTIME - IMPLEMENTATION PROJECT PLAN

	PROJECT TASKS	EXECUTIME RESOURCES	CLIENT RESOURCES	ONSITE / REMOTE	STATUS	TARGET DUE DATE	ACTUAL COMPLETION	ADDITIONAL NOTES
DEPLOY	Established / Target Go Live Date (#1)	Project Manager	Project Manager	Remote	Pending	11/24/2018	TBD	
	ExecuTime in Production!	Project Manager	Project Manager	Remote	Pending	11/24/2018	TBD	
								LIVE Pay Period: 3/31 - 4/13 (Export: 4/18/2018)
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Pending	11/24/2018	TBD	*See "Milestone Acceptance" tab*
	Introduction to Client Support Team	Project Manager	Project Manager	Remote	Pending	1/24/2018	TBD	
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Open	1/24/2018	TBD	*See "Milestone Acceptance" tab*
	Project Closure / Project Sign Off	Project Manager	Project Manager	Remote	Open	1/24/2018	TBD	
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Project Manager	Remote	Open	1/24/2018	TBD	*See "Milestone Acceptance" tab*

** End of Project Plan Document **

**** Client will NOT utilize clocks ****

TIME CLOCKS	Send sample badge to ExecuTime for testing	Project Manager	Project Manager	TBD	Open	6/14/2017	TBD	
	Determine badge id vendor (if applicable)	Project Manager	Project Manager	TBD	Open	6/14/2017	TBD	
	Procure timeclock hardware	Project Manager	Project Manager	TBD	Open	7/5/2017	TBD	
	Ensure clock locations have network connectivity	N/A	IT Dept	TBD	Open	7/19/2017	TBD	
	Provides list of IP addresses for Timeclocks	Project Manager	IT Dept	TBD	Open	7/19/2017	TBD	
	Technical Clock Configuration Training	Project Manager	IT/Project Manager	N/A	N/A	N/A	TBD	

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**This document indicates that the following activities/milestones have been satisfactorily completed and that Palm Desert, CA authorizes Tyler Technologies executime to proceed to the next step in the implementation/project closure.*

PROJECT PLAN TIMELINE ACCEPTANCE - Palm Desert, CA

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Project plan timelines are mutually accepted by Tyler and Client	J. Moore	9/5/2017	
*Updated dates to be selected by 12/8/2017			
CLIENT PROJECT MANAGER SIGNATURE	Janet Moore (provided signature)	**DATE: 9/5/2017**	

SOLUTION DESIGN ACCEPTANCE - Palm Desert, CA

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Signed and Approved Solution Design	J. Moore	8/30/2017	**Signed**
Application Server Install	Tyler OSDBA Team	7/11/2017	**Signed**
CLIENT PROJECT MANAGER SIGNATURE	Janet Moore (provided signature)	**DATE: 9/5/2017**	

DATA INTEGRATION ACCEPTANCE - Palm Desert, CA

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Employee integration Sign Off	C. VonHelf	9/20/2017	**Signed**
Leave Accrual Benefit Sign Off	C. VonHelf	9/20/2017	**Signed**
Project Costing Sign Off	J. Moore	1/12/2018	**Signed**
CLIENT PROJECT MANAGER SIGNATURE	Clayton Von Helf (provided signature)	**DATE: 09/20/2018**	

TRAINING ACCEPTANCE & PROCEED TO PRODUCTION ACCEPTANCE - Palm Desert, CA

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Power User Training Acceptance	Clayton Von Helf (provided signature)	**4/18/2018**	
End User/Super User Training(s) Acceptance	Clayton Von Helf (signature needed)	10/26/2018	**Signed**
Payroll Export Training Acceptance	Clayton Von Helf (signature needed)	10/26/2018	**Signature needed**
Client completed Go Live Checklist	Clayton Von Helf (signature needed)	10/26/2018	**Signature needed**
Payroll Export Acceptance Test	Clayton Von Helf (signature needed)	10/26/2018	**Signature needed**
CLIENT PROJECT MANAGER SIGNATURE		**DATE**	

PRODUCTION ACCEPTANCE - Palm Desert, CA

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
ExecuTime In Production!	Clayton Von Helf (signature needed)	pending	**Signature needed**
First full pay period processing	Clayton Von Helf (signature needed)	pending	
Transition to Support	Clayton Von Helf (signature needed)	pending	
CLIENT PROJECT MANAGER SIGNATURE		**DATE**	

PROJECT ACCEPTANCE - Palm Desert, CA

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Project Closure/Project Sign off	Clayton Von Helf (signature needed)	Pending	
CLIENT PROJECT MANAGER SIGNATURE		**DATE**	

GO LIVE CHECKLIST

	PROJECT TASKS	COMPLETED BY:	COMPLETION DATE	NOTES
ADMIN TRAINING	Review pay codes for accuracy			
	Verify benefit accrual balances for accuracy	City of Palm Desert, CA team	9/20/2017	
	Create/Review Supervisor security roles & permissions for accuracy	City of Palm Desert, CA team		
	Review and test overtime policy	City of Palm Desert, CA team		
	Review and test comp policy	City of Palm Desert, CA team		
	Create schedules and apply to employees	City of Palm Desert, CA team		9/80 Schedules
	Verify job costing codes for accuracy	City of Palm Desert, CA team		
	Review holiday schedule for accuracy	City of Palm Desert, CA team	N/A	Palm Desert will not use Holiday Schedules. Employees will manually enter on their time cards.
	Review and test salary timecards with auto hours	City of Palm Desert, CA team	N/A	Palm Desert will not use salary policies - 10/17: Turned off all flags on emply. Types.
	Confirm payroll interface has been installed by payroll vendor	City of Palm Desert, CA team	9/20/2017	
	****Above tasks must be completed before moving forward to the next training****			
USER & SUPERVISOR TRAINING	Ensure employees have access to ExecuTime URL	City of Palm Desert, CA team		
	Test user authentication. Ensure all users can login	City of Palm Desert, CA team		
	Verify users have access to appropriate system menus	City of Palm Desert, CA team		
	Ensure all employees have received proper training & documentation	City of Palm Desert, CA team		
	Ensure all supervisors have received proper training & documentation	City of Palm Desert, CA team		
	****Above tasks must be completed before moving forward to the next training****			
PILOT TESTING	Identify employees to be included pilot test	City of Palm Desert, CA team	9/14/2017	
	Establish pay period dates for the pilot test	City of Palm Desert, CA team	9/5/2017	
	Launch pilot testing for two full pay periods	City of Palm Desert, CA team		
	Test payroll export of timecards with pilot group	City of Palm Desert, CA team		
	Client approval of payroll export data	City of Palm Desert, CA team		
	****Above tasks must be completed before moving forward to the next training****			
DEPLOY	Establish Go Live Date	City of Palm Desert, CA team	9/5/2017	
	Communicate with internal personnel	City of Palm Desert, CA team		
	ExecuTime in Production!	City of Palm Desert, CA team		

PROJECT MANAGER SIGNATURE   DATE

PROJECT MANAGER SIGNATURE   DATE

End of Document

PROJECT CHANGE LOG AND ACTION ITEMS

Date Submitted	Submitted By	Change Request or General Action Item	Approved By	Statement of Issue	Additional Notes	Assigned Ref#	Issue Owner	Resolved? Y/N/P/U*

*Y=Yes, N=No, P=Partially, U=Unknown

Connectivity

Environment		
Network Connectivity		
	VPN Type (ie Cisco/Cisco Any Connect -etc)	
	IP address	
	Username	
	Password	
	Domain	
	Any additional information	
Server Connectivity		
	IP address (Internal)	
	IP address (External for employees to access application)	
	Username	
	Password	
	Domain	
Database Connectivity		
	IP address	
	Database Name	
	Database User	
	Database Password	
Payroll Database Connectivity		
	Payroll Name	
	Type (Web Interface, Database, Flat File)	
	IP address	
	Database Name	
	Database Username	
	Database Password	
	Library(if applicable)	

ExecuTime Training Sessions

Course Title	Estimated Duration	Course Description
Administration Session	3 hour	This course will provide an overview of basic employee functions and supervisor functions. Topics will include time entry screens, timecard approval, supervisory timecard maintenance, managing time-off requests, pay codes, employee files, security roles, policy and rule set up such as overtime, comptime, shift differential along with schedules and job costing fields, holiday set up, payroll funcations, and user interface options. It is recommended for all members of the implementation team to attend this course.
Basic Employee/User	1 hour	This course is intended to familiarize the basic employee with ExecuTime. The employee will learn how to log in to ExecuTime, clock in/out, view the time sheet, view benefit hours, request time off and other data related to the employee's time and attendance. ALL supervisors should be required to attend this session as well.
Supervisor Training	1 hour	This course is designed for supervisors who will review and approve employee time cards. The supervisor will learn how to maintain and edit employee time cards, manage time off requests, approve time cards for payroll and run selected reports.
Payroll Export	1 hour	This course will demonstrate and review how to balance time cards for a specific period and move the data into the payroll system. Typically the payroll department employees attend this class. All Time Balancers should attend Basic Employee and Supervisor Training as well. This course is scheduled AFTER the payroll export programming has been completed.

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*This document indicates tasks & time spent on the Palm Desert, CA Timekeeping Project

T&A Professional Services

Total Hours Purchased	80
Remaining Hours Balance	**4.75**

Breakdown of Hours	Task	Hours Used	Completed By	Billed Out	
	Total time spent with Hillary	0.00	Hillary	yes	**20 hours spent with Hillary (comped)**
	Set email notifications to allow	0.25	Talia	Yes	
	Communication tab configuration	0.25	Talia	yes	
	Weekly call scheduling	0.25	Trey	yes	
	Missed weekly call 02/08	0.25	Talia	yes	
	Weekly call 02/15/2018	1.50	Talia	yes	
	Attempt to schedule user trainings	0.50	Trey	yes	
	updateing project hours	0.25	Trey	yes	
	Weekly call (03/01/2018)	0.50	Trey	yes	
	Missed weekly call 03/08/2018	0.25	Trey	yes	
	Updated Project plan	0.25	Trey	yes	
	Missed weekly call (03/15/2018)	0.25	Talia	yes	
	Missed weekly call 03/22/2018	0.25	Talia	yes	
	Missed weekly call/Call into Project sponsor (03/29/2018)	0.50	Talia	yes	
	Impl. Discussion	0.25	Talia	yes	
	Project Call coordination	0.25	Talia	yes	
	Updated timeline	1.00	Talia	yes	
	Received PU checklist/sign off	0.25	Talia	yes	
	Updated Impl. Hours & OneDrive	0.25	Talia	yes	
	Trey - Billed - Scheduling weekly project call	0.50	Trey	Yes	
	Trey - Billed - Scheduling End User / Supervisor Training	0.75	Trey	Yes	
	Trey - Partially Billed 1h 15 min - Joe and Sally Configuration	1.25	Trey	Yes	
	Trey - Billed - Updating Project Plan	0.25	Trey	Yes	
	Trey - Billed - Weekly Project Call	0.75	Trey	Yes	
	Trey - Billed - Project Call Recap Email	0.50	Trey	Yes	
	Trey - Billed - Rescheduling Payroll Training and Project Call	0.25	Trey	Yes	
	Trey - Billed - Updating the End User Training Handout	0.75	Trey	Yes	
	Trey - Billed - Weekly Project Call	0.25	Trey	Yes	
	Trey - Billed - Updating Manage Own Data Flag	0.75	Trey	yes	
	Trey - Billed - Reviewing Joe and Sally Set up	1.25	Trey	yes	
	Trey - Billed - Palm Desert, CA - End User Training (up to 2 sessions)	2.50	Trey	yes	
	Trey - Billed - Palm Desert, CA - Super User Training (2 sessions)	2.50	Trey	yes	
	Trey - Billed - Scheduling Configuration Changes Call	0.25	Trey	yes	
	Trey - Billed - Updating UI setting for Declined Time Off Requests	0.25	Trey	yes	
	Trey - Billed - Setting up Schedule sets and adjusting employee profiles.	1.25	Trey	yes	
	Trey - Billed - Responding to Pay Period Question	0.25	Trey	yes	
	Trey - Billed - Weekly Project Call	1.25	trey	yes	
	Trey - Partially Billed 15 min - Scheduling Pay Period Call	0.25	trey	yes	
	Trey - Billed - Reviewing Items and config from the project call	0.75	trey	yes	
	Trey - Billed - Changing 8 hr salary employees to salaried	2.50	trey	yes	
	Trey - Billed - Call to discuss schedule set up and pay periods	0.50	Trey	yes	
	Trey - Billed - Updating schedules and pay periods for employees	3.00	trey	yes	
	Trey - Billed - Weekly Project Call	0.75	Trey	yes	
	Trey - Partially Billed 1h 30m - Correcting the Flex Schedules	1.50	Trey	yes	
	Trey - Billed - Responding to Clayton about Schedules	0.25	Trey	yes	
	Trey - Billed - Meeting to discuss Pay Periods	0.50	Trey	yes	
	Trey - Billed - Created backup DB and turned off update flag for pay periods.	0.25	Trey	yes	
	Trey - Billed - Updating employee history for the pay period changes	1.25	Trey	yes	
	Trey - Billed - Call with Development to discuss schedules export	0.25	Trey	yes	
	Trey - Billed - Emailed Clayton Information needed for payroll export	0.50	Trey	yes	
	Trey - Billed - Weekly Project Call and Recap Email	1.00	Trey	yes	
	Trey - Billed - Confirming Pay Day	0.25	Trey	yes	
	Trey - Billed - Weely Project Call and Recap Email	1.00	Trey	yes	
	Trey - Billed - Corrected the 1st Monday Schedule	0.50	Trey	yes	
	Trey - Billed - Amber Molina Schedule	0.50	Trey	yes	
	Trey - Billed - Apply the JAR	0.25	Trey	yes	
	Trey - Billed - Tested the Payroll Preview	0.25	Trey	yes	
	Trey - Billed - Emailed Palm Desert to validate the payroll preview	0.25	Trey	yes	
	Trey - Billed - Weekly Project Call and recap email	2.00	Trey	yes	
	Trey - Billed - Updating Project Plan	0.25	Trey	yes	
	Trey - Billed - Answering Project Call Questions	1.50	Trey	yes	
	Trey - Billed - Weekly Project Call and Recap Email	2.00	Trey	yes	
	Updated implementation timeline	0.25	Talia	yes	
	Wrote payroll export design & next steps	1.00	Talia	yes	
	Changes to the payroll export	0.50	Talia	yes	
	Trey help	0.25	Talia	yes	
	Addt'l Changes to the payroll export	0.25	Talia	yes	
	Training escalation	0.25	Talia	yes	
	Project call 06/19/2018	1.00	Talia	yes	
	Project Call	2.00	Talia	yes	
	Trey - Billed - Turning off update flag in SQL and setting data to test prior to 7/6	0.75	Trey	yes	
	Trey - Billed 2 hour - Default Pay code on timesheet / Incorrect Hours	2.00	Trey	yes	
	Trey - Billed - Weekly Project Call and Recap Email	1.00	Trey	yes	
	Project Call 06/27/2018	1.25	Talia	yes	
	Updated Implementation hours	0.25	Talia	yes	
	Project Call 06/28/2018	1.75	Talia	yes	
	Request to change export to flat file	1.25	Talia	yes	
	Weekly call cancellation	0.25	Talia	yes	
	Weekly Project Call 07/12/2018	0.75	Talia	yes	
	Updated Implementation TL & Hours	0.50	Talia	yes	
	Change to export, from DB to Flat File	0.25	Talia	yes	
	Trey - Palm Desert, CA - Weekly Meeting, Tasks & Calls (Week: 09/10 - 09/14)	1.25	Trey	yes	
	Trey - Palm Desert, CA - Weekly Meeting, Tasks & Calls (Week: 09/17 - 09/21)	0.75	Trey	yes	
	Payroll export change	0.50	Talia	yes	
	Internal discussion regarding export change needed	0.00	Talia	no	no charge
	Generated DB back up for dev ticket	0.25	Talia	yes	
	Addtional export changes	1.00	Talia	yes	
	Trey - Palm Desert, CA - Weekly Meeting, Tasks & Calls (Week: 09/24 - 09/28)	0.50	Trey	yes	
	Trey - Palm Desert, CA - Weekly Meeting, Tasks & Calls (Week: 10/08 - 10/12)	2.75	Trey	yes	
	Trey - Palm Desert, CA - Weekly Meeting, Tasks & Calls (Week: 10/15 - 10/19)	3.75	Trey	yes	
	Trey - Palm Desert, CA - Weekly Meeting, Tasks & Calls (Week: 10/22 - 10/26)	0.75	Trey	yes	
	Impl. Hours and Project plan updates	0.25	Talia	yes	
	Payroll export changes/assistance	0.25	Talia	yes	
	Additional export changes	0.50	Talia	yes	
	Follow up on export changes	0.25	Talia	yes	
	Project call & action items	2.00	Talia	yes	
	Go live confirmation email	0.25	Talia	yes	

Total Duration **75.25**

GO LIVE CHECKLIST

	PROJECT TASKS	COMPLETED BY:	COMPLETION DATE	NOTES
POWER USER TRAINING	Review pay codes for accuracy			
	Verify benefit accrual balances for accuracy			
	Create supervisor permission roles			
	Review basic employee security role(s) & permissions for accuracy			
	Review and test overtime policies			
	Review and test comp policies			
	Create schedules and apply to employees (if applicable)			
	Verify job costing codes for accuracy (if applicable)			
	Review holiday schedule for accuracy			
	Review and test salary timecards with auto hours			
	Confirm payroll interface has been installed by payroll vendor			

****Above tasks must be completed before moving forward to the next training****

	PROJECT TASKS	COMPLETED BY:	COMPLETION DATE	NOTES
END USER & SUPER USER TRAINING	Ensure employees have access to ExecuTime URL			
	Test user authentication. Ensure all users can login.			
	Verify users have access to appropriate system menus			
	Ensure all employees have received proper training & documentation			
	Esure all supervisors have received proper training & documentation			

****Above tasks must be completed before moving forward to the next training****

	PROJECT TASKS	COMPLETED BY:	COMPLETION DATE	NOTES
PILOT TESTING	Identify employees to be included pilot test			
	Establish pay period dates for the pilot test			
	Launch pilot testing for one full pay period			
	Test payroll export of timecards with pilot group			
	Client approval of payroll export data			

****Above tasks must be completed before moving forward to the next training****

	PROJECT TASKS	COMPLETED BY:	COMPLETION DATE	NOTES
DEPLOY	Establish Go Live Date			
	Communicate with internal personnel			
	ExecuTime in Production!			

PROJECT MANAGER SIGNATURE ____________________ DATE ____________

PROJECT MANAGER SIGNATURE ____________________ DATE ____________

EXHIBIT
6
1/19/22 Harrison Rptr: LO

End of Document

IMPLEMENTATION PROJECT PLAN

	PROJECT TASKS	CLIENT RESOURCES	ONSITE / REMOTE	STATUS	TARGET DUE DATE	ACTUAL COMPLETION	ADDITIONAL NOTES
TIMEKEEPING DESIGN	Welcome Packet provided to client	Project Manager	Remote	Complete	3/9/2018	3/9/2018	
	Questionnaire /Agenda Provided to client	Project Manager	Remote	Complete	3/19/2018	3/19/2018	
	Stakeholder Kick Off Meeting	Implementation Team	Remote	Complete	3/19/2018	3/19/2018	
	Project Plan Timelines Finalized	Project Manager	Remote	Pending	10/26/2018	TBD	
	*****Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Remote	Pending	10/26/2018	TBD	*See "Milestone Acceptance" tab*
	Completed Questionnaire returned To ExecuTime	Implementation Team	Remote	Complete	4/5/2018	TBD	
	Hardware & Integration Planning	Implementation Team	Remote	Complete	3/19/2018	3/19/2018	
	Solution Design & Scope of Work Discussion with client	Implementation Team	Remote	Complete	4/6/2018	4/6/2016	
	Signed & Approved Solution Design Document	Implementation Team	Remote	Complete	6/4/2018	6/4/2018	
	*****Acceptance Milestone Sign Off (see Milestone Tab)*****	Implementation Team	Remote	Complete	6/4/2018	6/4/2018	*See "Milestone Acceptance" tab*
HARDWARE / INTEGRATION	Completed VPN Document (if applicable)	IT Dept	Remote	NA	NA	NA	See "Connectivity" tab-client will complete
	Completed Connectivity Documentation	IT Dept	Remote	NA	NA	NA	**Will use GOTOMEETING to connect to server**
	Test connectivity to Payroll Server	IT Dept	Remote	NA	NA	NA	
	Test remote connectivity to client Server	IT Dept	Remote	NA	NA	NA	
	Verify minimum hardware specs are met	IT Dept	Remote	Complete	5/29/2018	5/29/2018	Not applicable for Cloud clients
	Application server install	N/A	Remote	Complete	5/29/2018	5/29/2018	
	Dept, Employee, Benefit Accrual Query	N/A	Remote	Pending	10/12/2018	TBD	
	Dept, Employee, Benefit Accrual Integration Programs	N/A	Remote	Pending	10/12/2018	TBD	
	Project Costing Query (if applicable)	N/A	Remote	Pending	10/12/2018	TBD	
	Project Costing integration programs (if applicable)	N/A	Remote	Pending	10/12/2018	TBD	
	*****Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Remote	Pending	10/26/2018	TBD	*See "Milestone Acceptance" tab*
	System Integration Signoff & Acceptance	Project Manager	Remote	Pending	10/26/2018	TBD	
TIME CLOCKS	Send sample badge to ExecuTime for testing	Project Manager	Remote	NA	NA	NA	
	Determine badge id vendor (if applicable)	Project Manager	Remote	NA	NA	NA	
	Procure timeclock hardware	Project Manager	Remote	NA	NA	NA	
	Ensure clock locations have network connectivity	IT Dept	Remote	NA	NA	NA	
	Provides list of IP addresses for Timeclocks	IT Dept	Remote	NA	NA	NA	
TRAININGS AND CHECKLIST	Power User Training	Implementation Team	Remote	Open	11/30/2018	TBD	See "Trainings" tab
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Remote	Open	12/31/2018	TBD	*See "Milestone Acceptance" tab*
	Power User Checklist	Implementation Team	Remote	Open	12/31/2018	TBD	See "Go Live Checklist" tab
	Production Go Live Planning	Implementation Team	Remote	Open	12/3/2018	TBD	
	Technical Clock Configuration Training	IT / Project Manager	Remote	NA	NA	NA	
	End User Training - Timekeeping	Implementation Team	Remote	Open	2/11/2019	TBD	**This training is inteded for pilot group users (SMEs). Users attending these trainings would be expected to begin paralleles with pay period start 02/11/2019**
	Super User Training - Timekeeping	Implementation Team	Remote	Open	2/11/2019	TBD	**This training is inteded for pilot group users (SMEs). Users attending these trainings would be expected to begin paralleles with pay period start 02/11/2019**
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Remote	Open	2/19/2019	TBD	*See "Milestone Acceptance" tab*
	End User/Super User Training Checklist	Implementation Team	Remote	Open	2/19/2019	TBD	See "Go Live Checklist" tab
	Payroll Export Training	Payroll Team	Remote	Open	3/18/2019	TBD	**This training would take place the later part of the week once city's true payroll has been completed.**
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Remote	Open	3/25/2019	TBD	*See "Milestone Acceptance" tab*

IMPLEMENTATION PROJECT PLAN

	PROJECT TASKS	CLIENT RESOURCES	ONSITE / REMOTE	STATUS	TARGET DUE DATE	ACTUAL COMPLETION	ADDITIONAL NOTES
PAYROLL	Payroll Export Integration Programs	N/A	Remote	Open	12/31/2018	TBD	
	Apply and Test Payroll Export (internal)	N/A	Remote	Open	1/7/2019	TBD	
PILOT TESTING	Identify Employees Who are in Pilot Group	Project Manager	Remote	Open	12/3/2018	TBD	
	Establish Pay Period Dates for the Pilot Test	Project Manager	Remote	Open	12/3/2018	TBD	
	Launch Pilot Testing #1 for One Full Pay Period	Project Manager	Remote	Open	2/17/2019	TBD	
	Client Sign Off on Pilot Test 1	Project Manager	Remote	Open	3/23/2019	TBD	
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Remote	Open	3/23/2019	TBD	*See "Milestone Acceptance" tab*
	Launch Pilot Testing #2 for One Full Pay Period	Project Manager	Remote	Open	3/17/2019	TBD	
	Client Sign Off on Pilot Test 2	Project Manager	Remote	Open	4/21/2019	TBD	
DEPLOY	Established / Target Go Live Date	Project Manager	Remote	Open	4/21/2019	TBD	
	ExecuTime in Production!	Project Manager	Remote	Open	4/21/2019	TBD	
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Remote	Open	4/21/2019	TBD	*See "Milestone Acceptance" tab*
	Introduction to Client Care Team	Project Manager	Remote	Open	6/21/2019	TBD	
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Remote	Open	6/21/2019	TBD	*See "Milestone Acceptance" tab*
	Project Closure / Project Sign Off	Project Manager	Remote	Open	6/21/2019	TBD	
	***** Acceptance Milestone Sign Off (see Milestone Tab)*****	Project Manager	Remote	Open	6/21/2019	TBD	*See "Milestone Acceptance" tab*

** End of Project Plan Document **

PROJECT CHANGE LOG AND ACTION ITEMS

Date Submitted	Submitted By	Change Request or General Action Item	Approved By	Statement of Issue	Additional Notes	Assigned Ref#	Issue Owner	Resolved? Y/N/P/U*

*Y=Yes, N=No, P=Partially, U=Unknown

executime
a total tyler solution

**This document indicates that the following activities/milestones have been satisfactorily completed and that the {CLIENT} authorizes Tyler Technologies executime to proceed to the next step in the implementation/project closure.*

PROJECT PLAN TIMELINE ACCEPTANCE

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Project plan timelines are mutually accepted by Tyler and Client	Melissa Goss/Ryan Bredehoeft	10/26/2018	Milestone signature needed

CIENT PROJECT MANAGER SIGNATURE DATE

SOLUTION DESIGN ACCEPTANCE

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Signed and Approved Solution Design	Melissa Goss/Ryan Bredehoeft	6/4/2018	Milestone signature needed
Application Server Install	Melissa Goss/Ryan Bredehoeft	6/5/2018	Milestone signature needed

CLIENT PROJECT MANAGER SIGNATURE DATE

DATA INTEGRATION ACCEPTANCE

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Employee integration Sign Off	Melissa Goss/Ryan Bredehoeft	10/26/2018	Milestone signature needed
Leave Accrual Benefit Sign Off	Melissa Goss/Ryan Bredehoeft	10/26/2018	Milestone signature needed
Payroll Export Acceptance Test	Melissa Goss/Ryan Bredehoeft		

CLIENT PROJECT MANAGER SIGNATURE DATE

TRAINING ACCEPTANCE & PROCEED TO PRODUCTION ACCEPTANCE

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Power User Training Acceptance	Melissa Goss/Ryan Bredehoeft		
Payroll Export Training Acceptance	Melissa Goss/Ryan Bredehoeft		
End User/Supervisor Training(s) Acceptance	Melissa Goss/Ryan Bredehoeft		
Time Clock Training Acceptance	Melissa Goss/Ryan Bredehoeft		
Client completed Go Live Checklist	Melissa Goss/Ryan Bredehoeft		

CLIENT PROJECT MANAGER SIGNATURE DATE

PRODUCTION ACCEPTANCE

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
First full pay period processing	Melissa Goss/Ryan Bredehoeft		
ExecuTime in Production!	Melissa Goss/Ryan Bredehoeft		
Transition to Customer Care	Melissa Goss/Ryan Bredehoeft		

CLIENT PROJECT MANAGER SIGNATURE DATE

PROJECT ACCEPTANCE

TASKS COMPLETED	COMPLETED BY:	COMPLETION DATE	NOTES
Project Closure/Project Sign off	Melissa Goss/Ryan Bredehoeft		

CLIENT PROJECT MANAGER SIGNATURE DATE

ExecuTime Training Sessions

Course Title	Estimated Duration	Course Description
Power User Training (System Administration)	3 hour	This course will provide an overview of basic employee functions and supervisor functions. Topics will include time entry screens, timecard approval, supervisory timecard maintenance, managing time-off requests, pay codes, employee files, security roles, policy and rule set up such as overtime, comptime, shift differential along with schedules and job costing fields, holiday set up, payroll funcations, and user interface options. It is recommended for all members of the implementation team to attend this course.
Time Clock/Device	1 hour	This course will review the general connectivity and polling parameters for clock devices. A demonstration of the basic functionality of the time clock will be reviewed. The specifics of the course will depend greatly on the brand and module of time devices. This course is intended for IT staff and System Administrators.
End User Training	1 hour	This course is intended to familiarize the general employee with ExecuTime. The employee will learn how to log in to ExecuTime, clock in/out, view the time sheet, view benefit hours, request time off and other data related to the employee's time and attendance. ALL supervisorory employees should be required to attend this session as well.
Super User Training	1 hour	This course is designed for users with a supervisory role (e.g. supervisors, department heads, etc.) who will review and approve employee time cards. The super user will learn how to maintain and edit employee time cards, manage time-off requests, approve time cards for payroll and run selected reports.
Payroll Export	1 hour	This course will demonstrate and review how to balance time cards for a specific period and move the data into the payroll system. Typically the payroll department employees attend this class. All Time Balancers should attend Basic Employee and Supervisor Training as well. This course is scheduled AFTER the payroll export programming has been completed.

executime
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This document details time spent on the Oregon City, OR Implementation.

T&A Professional Services

Total Hours Purchased	96
Remaining Balance	**77.50**

Breakdown of hours

Task	Duration (hours)	Billed?	Completed by	
Questionnaire, Stakeholder Presentation & Timeline creation	0.25	yes	Talia	
Stakeholder Presentation agenda	0.25	yes	Talia	
Stakeholder Presentation and Recap	1.00	yes	Talia	
Technical coordination	0.25	yes	Talia	
Questionnaire follow up	0.25	yes	Talia	
Questionnaire questions and follow up	0.50	yes	Talia	
Project Plan Updates/OneDrive	0.25	yes	Talia	
Tech review call rescheduling	0.25	yes	Talia	
Solution Design call & recap	1.50	yes	Talia	
Technical Review call	0.50	yes	Talia	
Solution Design creation	1.25	yes	Talia	
Employee Demographic check in w/Incode	0.50	yes	Talia	
Updated Impl. Hours & OneDrive	0.25	yes	Talia	
Trey - Billed - Bi Weekly Status Call	0.50	yes	Trey	
Trey - Billed - Call to discuss compatibility with Incode	0.50	yes	Trey	
Install/conversion follow up	0.50	yes	Talia	
Obtain integation files - Discussions	0.75	yes	Talia	
Technical Review call	0.25	yes	Talia	
Notice of Install	0.25	yes	Talia	
Integration questions	0.50	yes	Talia	
Solution Design revison	2.00	yes	Talia	
Updated Impl. Hours & OneDrive	0.25	yes	Talia	
Obtain integration files additional work	0.50	yes	Talia	
Missed scheduled call	0.50	yes	Talia	
AsOne Inquiry	0.50	yes	Talia	
Trey - Billed - Oregon City, OR - Integration Prep	1.25	yes	Trey	
Trey Oregon City, OR - Weekly Meetings, Tasks & Calls (Week: 10/08 - 10/12)	0.50	yes	Trey	
Trey - Billed - Oregon City, OR - Data Integration Acceptance	0.5	yes	Trey	
Assistance with integration file issues	0.50	yes	Talia	
Project check in & timeline creation	0.75	yes	Talia	
Project call coordination with Ryan	0.75	yes	Talia	
Checked in with internal team regarding upgrade	0.00	no	Talia	no charge
Trey Oregon City, OR - Weekly Meetings, Tasks & Calls (Week: 10/22 - 10/26)	0.25	yes	Trey	

Total Duration **18.50**

Rhea, Shikendra B.

From: Jarvis, Hillary
Sent: Wednesday, January 12, 2022 4:51 PM
To: Burns, Jamie
Subject: FW: Talia/Trey Client synopsis

EXHIBIT
9
1/19/22 Harrison Rptr: LO

From: Harrison, Talia <Talia.Harrison@tylertech.com>
Sent: Wednesday, August 15, 2018 1:19 PM
To: Griffiths, Trey <Trey.Griffiths@tylertech.com>
Cc: Pasch Hillary <Hillary.Pasch@tylertech.com>
Subject: RE: Talia/Trey Client synopsis

Hey Trey,

Below is an updated synopsis for our clients, I am still updating ad adding notes. Most of this information is for you to know where the project stands, anything that is an action item for you to follow up with has a due date in read. Let me know if you have any questions, I'm sure I will send this to you at least two more times before the end of the week😊

Client Synopsis

Muskogee, OK
- There is a JAR attached to NI-25709, Trey please apply it to the clients system **Due 08/13** - **Completed**
- We will follow up with Kelly on the weekly call Tues **8/14** and work with her on testing – **Completed**
- Client to transition to support 08/16 @ 3pm cst
- Chris is reaching out to Superion to schedule a call so that I can work with them on mapping the job costing fields to payroll

American Samoa
- Reggie has a ticket to copy the et production database to ET Test database - **Completed**
- Talia has an email into Dev to see if a new JAR is needed as well as testpayroll export folder on the server – **Completed, additional JAR not needed, testexport folder will be needed**
- Talia asked Andrew to sign off on Pilot Testing and Established Go Live from the Admin Checklist as well as Data Integrations Acceptances & Training Acceptance final tasks on **08/10 – PENDING**
- Talia has also asked Andrew to provide dates for export comparison and final pay period to test with, account may go on hold if we cannot solidify a go live - **PENDING**

Baton Rouge
- Talia/Trey – Onsite for user trainings 08/20 thru 08/24
- Trey's working on building security roles for the city – **Due Date 08/17**

Bowling Green

- Talia emailed signature requirements for Integration Approval and Implementation Timeline Approval on **08/06**
- Brian would like to meet to review the above as he doesn't recall what info was to be reviewed call scheduled for **08/13 - Complete**
- Clocks – Erin reached out to them regarding their clocks, not sure if she's received a response so I asked for a follow – **Completed, 1 clock was ordered**
- No VPN needed since this client is self-hosted
- Trey, please reach out to Brian Bushong for the IP to be used on the clock purchased, that way you have what you need on the clock has been received. You'll want to include in that email that they notify you once they have the clock and it is powered on & connected to the network – **Due 08/17**

Calvert, MD

- Waiting on the site report information and external link to be configured – **Completed, however external link currently isn't working. Once we have the files we will move forward by connecting to the server to prep the application for integration**
- Jonathan (Superion) & Lynn have been in contact regarding the extract files - **NI-17437 Talia reached out to Nick w/Superion regarding integration files**
- Talia to map out timeline and Integration Approval

Davis County, UT

- Clocks shipped 07/30/2018 – **Trey to confirm receipt of clocks with client** – **Due 08/21**
- We have the initial files for integration sent by Tom
- Trey can begin prepping the application once we are able to log into the application, we may be able to complete this from the server via gotomeeting once we're ready – **Lets coordinate connecting to the server to prep the application for integration instead of waiting on the external link – Due 08/17**
- External link not working
- Talia owes them a Solution Design☹, I sent an email to follow up on some items I'd like to include in the design **08/10**

Emeryville

- Trey to complete recording per Mikes request - **Complete**
- Currently out of implementation hours
- Trey working with Mike to move recordings to Mikes machine

Germantown, TN

- Project call scheduled for 08/13 to relaunch implementation

Harrisonville, MO

- Comp max issue has been resolved. I thought Lindsay was working on the export issue, by the time I got her connected I realized she had the comp issue instead. In the future when scheduling a troubleshooting ticket with support please coordinate a go to meeting the person who has the ticket. You'll want to establish any connections for servers for the support rep to look at the issue.
- Issue with Export has been assigned to Dev for an upgrade, Reggie has the ticket assigned to him – **Complete**
- Trey has tested the export and confirmed the reg hours code is now exporting properly. Trey will coordinate Allison to be on the call with Harrisonville and test the export out of ET and upload to Incode – **Due 08/17/2018 (client is scheduled to go live 08/27 so we need to ensure this is resolved before we head out of town)**

- Hillary is working on Invoice questions from client – **Complete**

Michigan City, IN

- Stakeholder Presentation scheduled for **08/16**
- Talia needs to build documents for presentation
- Installation of ExecuTime is scheduled **Due Date 09/12**

NW MI Council Governments

- Solution Design call scheduled for **08/29/2018**

Nixa

- There's a new JAR out for this client, see NI-18246, Trey please apply to clients system and test generating a file out of ExecuTime in preparation for Export training **Due 08/17**
- Once we are ready for export training, please coordinate having Allison on the line so that you ca do your spill and then she can take over and walk the client through loading the file in Incode
- We are still waiting on Amanda to confirm which field in Incode the grants should be sent to, please continue to follow up and push for a response on this item – Trey please keep your finger on the pulse for this information, this should be included in every recap and mentioned during every call until we have what we need **Due 08/22/2018**
- Nixa unable to use external link, Talia to troubleshoot but for now advised Trey to have the client use their production link. If client has issues with the production link that will change the priority of this issue – **Due Date 08/29/2018**

Oak Harbor

- Talia to update the action items list from Patricia **Due Date 08/17/2018 - completed**
- Patricia has indicated that she provided the Fire & Police dept tracking codes to Trey on 08/10 – Trey to build codes in Oak Harbor's application under System Admin>Job Costing>Department Tracking Codes – **Due Date 08/17**
- Trey is looking into the issue with employee status not updating with the nightly job. He may schedule a call with support to trouble and involve Eden if necessary – **Due date 08/29/2018**

Oregon City, OR

- Client is interested in implementing one Incode AsOne is available, Hillary has an email out to Melissa dated 08/09 referencing when this will be available and if she wishes to wait to implement

Osage Beach, MO

- Pending Solution Design approval
- NI-21635 – Emailed Trey for an update on the VPN document and CRM to be completed for configuration of the VPN device.
- Waiting on integration files. I send Brenda and Kim an email asking for an update 08/14

Palm Desert, CA

- Pending payroll export change to convert them to a flat file export, email in to Hillary as to whether this should be billable or not
- Client should be entering time to test the export with but we haven't heard back, Trey to follow up with Clayton

Santa Rosa County, FL

- Integration pending with Trey, once completed and I am notified that the integration review call is scheduled I will plan to request signatures

Signal Hill, CA

- I sent them the first draft of their Solution Design today 08/14/2018
- ExecuTime has been installed on the server
- This client is converting data from Incode9 to Incode10 and as of June 5th Anna Allen indicated they were in the beginning stages. I've reached out to Anna, to see if there are any updates as to where they are with producing files for integration 08/14/2018
- This client is hosted, Trey please send them the VPN document for completion if you haven't done so already. Once you have the completed document you would create a CRM for networking and attach the completed document to the CRM ticket Due **08/21/2018**
- Anna replied, they have employees ready so she's reaching out to the team to train them on how to generate the extract files **08/15/2018**

St. Johns Fire District

- Pending questionnaire & Solution Design call (Sd call scheduled for

Youngsville, LA

- I will be reaching out to the client to see if we can get things moving

Rhea, Shikendra B.

From:	Harrison, Talia
Sent:	Tuesday, October 30, 2018 3:49 PM
To:	Pasch Hillary
Subject:	Talia/Trey Implementation Tracker
Attachments:	Implementation Tracker.xlsx

EXHIBIT
10
1/19/22 Harrison Rptr: LO

Hey Hillary,

I've combined the information Trey provided in his document with additional tasks that should be/will be completed throughout the implementation. My thought is, it would be used as an easy checks/balance between myself & an IC considering the changes coming with how billing will be handled. I believe it would be easy to keep this document opened during the day, applied updates which for the most part would just be a "x" that the task was completed or scheduled along with a date.

I don't want to over complicate the process but more so than anything I learned during my time having an IC and trying to transition him into completing task while I monitor and assist is difficult when I'm not always sure where the project stands, notes/emails are in the tickets etc.

I started the tasks with integration prep since that is where the IC picks up the project, if this document is something we could all use, and be something that would be sent on a weekly basis I think it would be great to add the stakeholder presentation, solution design call/creation/approval etc so that the IC knows what's coming down the pipeline.

Any who, I just wanted to share. I am still finalizing where each of my clients are but wanted to go ahead and send over what I have thus far.

Regards,
Talia

Talia Harrison
Sr. Project Manager Lead
Tyler Technologies, Inc.

P: 800.772.2260 ext. 4840

www.tylertech.com

Empowering people who serve the public®

Rhea, Shikendra B.

EXHIBIT
11
1/19/22 Harrison Rptr: LO

From:	Harrison, Talia
Sent:	Tuesday, October 8, 2019 1:24 PM
To:	Burns, Jamie
Subject:	RE: Meeting to discuss my team
Follow Up Flag:	Follow up
Flag Status:	Completed

Hey,

Okay we can still meet if you want but I did just have a heart to heart with Brian and brought to his attention some of the feedback we've been getting. I was also able to provide some positive feedback as well (Starkville). I basically just let him know that he may need to inquiry a little more when clients are asking for functionality he's not sure about. I told him to use the fact that we are constantly rolling out new features as a reason to "look into their request further". That way he buys himself some time to check with me/other ICs.

I know Brian is trying and so I wanted to be fair and just keep it real with him so that he has an opportunity to work on these things.

We discussed his semi-monthly tickets, billable days & submitting NBCTQ as well. All in all he took the constructive criticism well. I told him that if there is anything I can do better to help him to let me know, even if that means scheduling more time with him. He assured me he'd work on the stuff I pointed out and will let me know what I can do to help.

T

Talia Harrison
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From: Burns, Jamie <Jamie.Burns@tylertech.com>
Sent: Tuesday, October 8, 2019 12:24 PM
To: Harrison, Talia <Talia.Harrison@tylertech.com>
Subject: RE: Meeting to discuss my team

Hi there. Ya.... Can you get something scheduled for Friday?

Regards,

Jamie Burns

From: Harrison, Talia <Talia.Harrison@tylertech.com>
Sent: Tuesday, October 8, 2019 11:28 AM
To: Burns, Jamie <Jamie.Burns@tylertech.com>
Subject: Meeting to discuss my team

Hey Jamie,

I know you mentioned us meeting this week to come up with a plan for my team, are you wanting me to schedule that call?

Thanks,

Talia Harrison
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Rhea, Shikendra B.

From: Harrison, Talia
Sent: Wednesday, December 12, 2018 4:57 PM
To: Greene, Suzanne
Subject: Suzi/Talia Impl Meeting recap

EXHIBIT
12
1/19/22 Harrison Rptr: LO

Hey Suzi,

Below is a quick recap of action items from our call today, please let me know if I have mistakenly misstated or left anything out.

- Outstanding list of items for clients being managed by Hillary - **Due 12/17**
  i. Confirmation on Go Lives for clients managed by Hillary – **Due 12/17**
  ii. My goal is to try and assist you and Hillary with some of these items so that we can move these clients our all our plates☺

- Scheduled time with me, reserved for working on clients we are co implementing
  i. Moving Monday morning meetings to 8am so that we can have an hour to prep for the week
  ii. Moving Wed's call to Fri for 30 minutes this will be to catch up and keep each other updated with items from the week
  iii. Of course we can schedule time in between when my assistance is needed and have impromptu meetings as well when needed

- Close email, Skype etc when sitting in on trainings with clients & internal presentations, weekly meetings, implementation calls etc if that helps keep you from being distracted. The point here is to just give your full attention to whomever you are on the phone with or listening to and again reduce you going from one thing to the next before finishing out tasks to be completed

- All training/meeting recap emails must be sent no more than 1 day later than when the call took place

  i. This also applies to gotomeeting invitations for calls, trainings etc. Please send these out as close to when you confirmed the date time as possible so that the client can send the information to attendees and reserve this time on their schedules as well

  ii. All tickets must be updated with copied emails and communications no later than the week the calls took place. So for example, while your recap is due to be sent

to the client no more than 1 day later then when the call took place. The semi-monthly ticket with this information copied to it must be updated in the same week that call took place.

- Answering calls for clients – While it's a great thing you answer when clients call and you're eager to assist them BUT this presents an interruption when you are in the middle of something and can cause conflict with billing hours, completing items for clients in a timely manner etc

  i. To address this, if & when a client calls me I will always (whether I'm on a call/meeting or not) let the phone ring and send them an email saying I see that are calling or have called. I tell them I am in the middle of a meeting and ask them to let me know via emails what's going on so I can assist via email or if emergent have someone reach out to them. This usually trains them to email me instead of calling without me having to say "please don't call me only email".

     I'd like for you to put this with any other goals you have set to streamline how you communicate with clients so that you can effectively manage your schedule as best you can with limited client interruption. This should also increase your ability to get recaps and gtm meeting invites etc out sooner than later and you'll soon see that the goals you set for yourself are more obtainable. Rule of thumb that I go by, if I know the client isn't processing a live export, it can wait.

  ii. With that being said, try to avoid scheduling yourself back to back for calls, you need that time in between to prepare. Especially when preparing for weekly calls, I always need time to go back and read the last recap I sent the client long before I get on the call with them. One, to make sure I have addressed my action items and two to make sure I know what I am expecting them to give me an update on

- Fridays are to be left open for catch up time; however, if you have a client requesting a call or training on Friday use your best judgement

Client related items

NW MI Council of Gov

i. Duration code can be set up by removing the allow for clock in/out transaction flag on the pay code
ii. You can turn the clocking abilities off for the entire application within the UI Flags
iii. You can also remove the start/in time fields from timesheet entry via the UI Flags

Davis County

i. Departments that are in ET that should not be were manually entered
ii. You can delete them as long as there are no employees attached

Osage

i. To troubleshoot missing employees, use the employee import file that should be in onedrive and I will load to kiteworks to make sure all the fields that are required to be in the application are there and match the exact format that is in the file. (Department name, employee type, pay period etc)

Talia big task!
Get all client documents loaded to KiteWorks so that you don't have to go between Kiteworks and OneDrive to find what you need Due **12/17**

T

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Rhea, Shikendra B.

From:	Harrison, Talia
Sent:	Thursday, March 7, 2019 3:37 PM
To:	Burns, Jamie
Subject:	RE: Implementation complaints

EXHIBIT
13
1/19/22 Harrison Rptr: LO

Hey there,
Just a quick follow up to my call with Dearborn after our call this afternoon. Her main complaint is just not having thorough responses and follow ups to open items and said that every recap she's ever received from Suzi came a day before their next weekly call so a week after the call.
The good news is, they did verbally confirm go live with 5 departments on 02/17 and paid them with this data on 03/05, they also brought on another 5 on 03/03
The action items she's pending with Suzi, I have Brian working on them now, most of them we were able to know out😊
I prepped her that we would plan to transition her account to support the week of 03/25 and she's okay with this as well
T

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From: Harrison, Talia
Sent: Thursday, March 7, 2019 10:42 AM
To: Burns, Jamie <Jamie.Burns@tylertech.com>
Subject: Implementation complaints
Hey Jamie,
Below is a recap of what was brought to my attention this week from each of the clients, please let me know if you need anything else
Osage Beach, MO (Go Live – 04/12)

- Cindy emailed me on 03/05 stating she's send Suzi several emails over the past week and hasn't received any responses - email attached

Dearborn, MO (Go-Live 02/17)

- This client should have been processing their first live export 03/05 but I received the email attached. Christine says the last weekly call recap she received from Suzi was on 02/19 & they've had 2 calls since then and no recap was sent. I looked through Suzi's semi-monthly tickets and no notes are listed
- This clients weekly call wasn't on my schedule for yesterday 03/06 so I missed sitting in for this call even though it was in Hillary's recap to me about filling in for Suzi. I was wrapped up with working with Brian and it completely slipped my mind
- Christine and I hae a call today at 2:30 but she's asking if there's any way I can get a recap from Suzi as she has now forgotten the action items she was supposed to be completing

Oregon City, OR (Go Live 04/21)

- During the weekly call with then 03/05, Ryan expressed frustration with Suzi's response time to their questions and issue. He said they send her items throughout the week and will not receive answers until their next weekly

call (scheduled on Tues). He said even then they seem to be getting the runaround. Melissa, the PM on this implementation had already looped me in on emails and said this had gotten much better of the last four weeks but before then she was beyond frustrated

Germantown, TN (Missed two go lives and refuses to sign off on a new date pending several unresolved issues)

- I met with this client this morning and Stephanie expressed frustrations with Reggie & Suzi. I've already escalated the issues related to Reggie to Greg and received a response. For Suzi, Stephanie said she feels like she's dragging them along. I took from this call Suzi isn't organized and doesn't seem to be providing them with what they need to keep the project moving

T

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Rhea, Shikendra B.

EXHIBIT
14
1/19/22 Harrison Rptr: LO

From:	Harrison, Talia
Sent:	Tuesday, January 14, 2020 11:47 AM
To:	Burns, Jamie
Subject:	RE: Brian Ledbetter
Attachments:	Brian Ledbetter Performance Eval notes.docx
Follow Up Flag:	Follow up
Flag Status:	Completed

See attached

Talia Harrison
Implementation Analyst
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From: Burns, Jamie <Jamie.Burns@tylertech.com>
Sent: Saturday, January 11, 2020 12:53 PM
To: Harrison, Talia <Talia.Harrison@tylertech.com>
Cc: Burns, Jamie <Jamie.Burns@tylertech.com>
Subject: Brian Ledbetter

Hi there,

I hope you are doing well. I wanted to see if you would mind sharing your thoughts regarding Brian in the following category. Thanks so much!

JOB KNOWLEDGE Refers to the knowledge, skills and experience required to perform the job. **Weight: 1.00**	*No manager comments have been added for this competency.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
DECISION MAKING	*No manager comments have been added for this competency.* **Rating:**	*The employee does not have this competency in a self-evaluation.*

Selects proper course of action among several alternatives. **Weight: 1.00**	edit	
DEVELOPMENT The extent to which someone seeks and achieves continuous improvement and growth. **Weight: 1.00**	*No manager comments have been added for this competency.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
DEPENDABILITY Can be relied on to get the job done. **Weight: 1.00**	*No manager comments have been added for this competency.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
WORK QUANTITY & QUALITY Refers to the amount of work produced and its accuracy, timeliness and thoroughness. **Weight: 1.00**	*No manager comments have been added for this competency.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
TEAMWORK The ability to work as an effective team member. **Weight: 1.00**	*No manager comments have been added for this competency.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
CLIENT FOCUS Ensures the product or service meets the client's expectations. **Weight: 1.00**	*No manager comments have been added for this competency.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
COMMUNICATION Transfers information from one person to another.	*No manager comments have been added for this competency.*	

Weight: 1.00	**Rating:** edit

Jamie Burns
Manager of Professional Services
Tyler Technologies, Inc.

P: 800.772.2260 ext. 4836

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JOB KNOWLEDGE Refers to the knowledge, skills and experience required to perform the job. **Weight: 1.00**	*Brian has been able to quickly learn the basic implementation life cycle and had been working to improve in the area of identifying individual site needs / learning styles per client, to adjust and implement accordingly. A goal I would have liked to see Brian set for 2020 would be to make more time for testing new functionality he's learned from working with others & review of release notes/training content shared.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
DECISION MAKING Selects proper course of action among several alternatives. **Weight: 1.00**	*There were often instances where no action took place on Brian's behave. When I would ask Brian about the status of an action item from a weekly call or confirmation a tasks had been completed in an effort to update the Implementation Timeline, his reply would be "I'll do it now" ; "I didn't know how you'd want me to move forward because…" or "I was going to ask you because I wasn't sure". In several instances delays with decision-making required I become heavily involved in the day to day functions of an IC in order to save go live. I would say most of this just came from Brian still learning what decisions he could make without me, learning what tasks in the timeline he could be working on while waiting on me to officially hand the project over to him, learning how to he could be proactive. A goal I would set for Brian would be pay more attention to the Implementation Timelines, strive to review all assigned TLs at least once a week, working one client at a time. Take on task in the*	*The employee does not have this competency in a self-evaluation.*

	timeline that you know you could be working on while the PM's working to solidify the timeline, provide integration connectivity details etc. This should also increase Brian's billable goal. Work towards staying ahead of the projects **Rating:** edit	
DEVELOPMENT The extent to which someone seeks and achieves continuous improvement and growth. **Weight: 1.00**	*Brian displayed growth in the area of learning the IC role and expectations. The more projects he took, I was able to tell he'd gotten the hang of the order in which certain tasks should take place. In the area of learning the application, I think Brian would take the responses/ steps I gave him and send it to the client without going into the application to review and gain the knowledge for future use. I include this comment because there were often times, I'd have to repeat troubleshooting steps, remind him of an email previously sent containing the response to the inquiry or process change. There were times we were sent information to be reviewed by Hillary in an effort to stay current/in the know, when I followed up with Brian to see if he had a chance to read/review the information that was shared he had not. Keeping up with Semi-Monthly tickets, including troubleshooting steps when creating cases for support was something, I'd often have to remind Brian of. Examples documentation review: AsOne Integration documentation, Workflow Management, internal process changes and Confluence as a reference tool for understanding standard*	*The employee does not have this competency in a self-evaluation.*

	import/export functionality, export links etc. **Rating:** edit	
DEPENDABILITY Can be relied on to get the job done. **Weight: 1.00**	*Brian is dependable; however, comments previously stated affected how well he was able to complete certain tasks assigned.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
WORK QUANTITY & QUALITY Refers to the amount of work produced and its accuracy, timeliness and thoroughness. **Weight: 1.00**	*Based on comments shared with myself, Hillary & Jamie from clients via email, transition to support surveys and escalations I would say some improvement as far as accuracy is needed by Brian. Comments where shared by clients about the quality of work delivered, some said they felt they knew more about the application than Brian did. Others shared when they asked Brian how to set something up, they were often today "you can really set it up however you'd like" not really giving them any direction/examples of what the application could do for them. I've also had several client's express frustration with Brian as far as asking him a specific question and receiving a response that the application couldn't handle their request. Then when the client came to me directly, they found what they'd asked Brian for was available.* *Brian shared with me multiple times the number of projects he was responsible for in addition to*	*The employee does not have this competency in a self-evaluation.*

	traveling as much has he had was overwhelming. *I would just recommend anything Brian has a "I don't think so" or "No" response to, he takes that down as an action item instead of providing that response right then in there. Research the inquiry and then follow up with the client to help retain credibility with clients. Use weekly calls to understand the challenges clients are running into and provide feedback in writing so that you can reference the response later for future implementations until you feel confident in your responses.* **Rating:** edit	
TEAMWORK The ability to work as an effective team member. **Weight: 1.00**	*Brian is a team player and had begun leaning on his team (other ICs) more about application knowledge & assistance.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
CLIENT FOCUS Ensures the product or service meets the client's expectations. **Weight: 1.00**	*I received several comments from clients stating they felt Brian wasn't helping them understand how the application needed to be configured to meet their needs but instead were told "it's really however you want to set it up". Examples: Santa Rosa, FL; Calvert County, MD; Bowling Green, OH; Homewood, AL* *A goal I would recommend for Brian would be to study the application more and become familiar with the varies ways certain configuration can be done so that clients can be given options they can choose from. One thing I tried to stress to Brian is that for*	*The employee does not have this competency in a self-evaluation.*

	the most part all our clients ask for the same stuff, they just word it differently. Take notes of the different questions you receive, take time to review those questions and play around in the application. Use those notes as a punch list to refer back to for future implementations. **Rating:** edit	
COMMUNICATION Transfers information from one person to another. **Weight: 1.00**	*Brian struggled with this, I was often going to him to requesting updates, following up on previous tasks I asked him to complete, status of timeline tasks and reminding him of deadlines. In cases where an update was given by Brian, I often had to ask for more details as the information provided would be vague and not enough for me to make a decision or provide suggestions/feedback. Clients often came to me asking for updates regarding action items Brian was working on for them. From an IC/Client standpoint, I feel Brian also struggles with controlling the project and keeping clients on task, providing timely feedback so that due dates aren't missed. We had a couple clients where Brian felt things going south based on how the client interacted with him, but this information wasn't brought to me until it was too late. This led to me having to take over many projects, travel onsite with a client and perform damage control.* *Goal setting, Brian should work on picking up on client frustrations sooner, be candid with clients to identify where they are feeling apprehensive so that he can manage frustration and/or work with his PM to defuse as many*	

	situations on his own and/or with the help of his PM. **Rating:** edit

EXHIBIT
15
1/19/22 Harrison Rptr: LO

JOB KNOWLEDGE Refers to the knowledge, skills and experience required to perform the job. **Weight: 1.00**	*Brian has been able to quickly learn the basic implementation life cycle and had been working to improve in the area of identifying individual site needs / learning styles per client, to adjust and implement accordingly. A goal I would have liked to see Brian set for 2020 would be to make more time for testing new functionality he's learned from working with others & review of release notes/training content shared.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
DECISION MAKING Selects proper course of action among several alternatives. **Weight: 1.00**	*There were often instances where no action took place on Brian's behave. When I would ask Brian about the status of an action item from a weekly call or confirmation a tasks had been completed in an effort to update the Implementation Timeline, his reply would be "I'll do it now" ; "I didn't know how you'd want me to move forward because…" or "I was going to ask you because I wasn't sure". In several instances delays with decision-making required I become heavily involved in the day to day functions of an IC in order to save go live. I would say most of this just came from Brian still learning what decisions he could make without me, learning what tasks in the timeline he could be working on while waiting on me to officially hand the project over to him, learning how to he could be proactive. A goal I would set for Brian would be pay more attention to the Implementation Timelines, strive to review all assigned TLs at least once a week, working one client at a time. Take on task in the*	*The employee does not have this competency in a self-evaluation.*

	timeline that you know you could be working on while the PM's working to solidify the timeline, provide integration connectivity details etc. This should also increase Brian's billable goal. Work towards staying ahead of the projects **Rating:** edit	
DEVELOPMENT The extent to which someone seeks and achieves continuous improvement and growth. **Weight: 1.00**	*Brian displayed growth in the area of learning the IC role and expectations. The more projects he took, I was able to tell he'd gotten the hang of the order in which certain tasks should take place. In the area of learning the application, I think Brian would take the responses/ steps I gave him and send it to the client without going into the application to review and gain the knowledge for future use. I include this comment because there were often times, I'd have to repeat troubleshooting steps, remind him of an email previously sent containing the response to the inquiry or process change. There were times we were sent information to be reviewed by Hillary in an effort to stay current/in the know, when I followed up with Brian to see if he had a chance to read/review the information that was shared he had not. Keeping up with Semi-Monthly tickets, including troubleshooting steps when creating cases for support was something, I'd often have to remind Brian of. Examples documentation review: AsOne Integration documentation, Workflow Management, internal process changes and Confluence as a reference tool for understanding standard*	*The employee does not have this competency in a self-evaluation.*

	import/export functionality, export links etc. **Rating:** edit	
DEPENDABILITY Can be relied on to get the job done. **Weight: 1.00**	*Brian is dependable; however, comments previously stated affected how well he was able to complete certain tasks assigned.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
WORK QUANTITY & QUALITY Refers to the amount of work produced and its accuracy, timeliness and thoroughness. **Weight: 1.00**	*Based on comments shared with myself, Hillary & Jamie from clients via email, transition to support surveys and escalations I would say some improvement as far as accuracy is needed by Brian. Comments where shared by clients about the quality of work delivered, some said they felt they knew more about the application than Brian did. Others shared when they asked Brian how to set something up, they were often today "you can really set it up however you'd like" not really giving them any direction/examples of what the application could do for them. I've also had several client's express frustration with Brian as far as asking him a specific question and receiving a response that the application couldn't handle their request. Then when the client came to me directly, they found what they'd asked Brian for was available.* *Brian shared with me multiple times the number of projects he was responsible for in addition to*	*The employee does not have this competency in a self-evaluation.*

	traveling as much has he had was overwhelming. *I would just recommend anything Brian has a "I don't think so" or "No" response to, he takes that down as an action item instead of providing that response right then in there. Research the inquiry and then follow up with the client to help retain credibility with clients. Use weekly calls to understand the challenges clients are running into and provide feedback in writing so that you can reference the response later for future implementations until you feel confident in your responses.* **Rating:** edit	
TEAMWORK The ability to work as an effective team member. **Weight: 1.00**	*Brian is a team player and had begun leaning on his team (other ICs) more about application knowledge & assistance.* **Rating:** edit	*The employee does not have this competency in a self-evaluation.*
CLIENT FOCUS Ensures the product or service meets the client's expectations. **Weight: 1.00**	*I received several comments from clients stating they felt Brian wasn't helping them understand how the application needed to be configured to meet their needs but instead were told "it's really however you want to set it up". Examples: Santa Rosa, FL; Calvert County, MD; Bowling Green, OH; Homewood, AL* *A goal I would recommend for Brian would be to study the application more and become familiar with the varies ways certain configuration can be done so that clients can be given options they can choose from. One thing I tried to stress to Brian is that for*	*The employee does not have this competency in a self-evaluation.*

	the most part all our clients ask for the same stuff, they just word it differently. Take notes of the different questions you receive, take time to review those questions and play around in the application. Use those notes as a punch list to refer back to for future implementations. **Rating:** edit	
COMMUNICATION Transfers information from one person to another. **Weight: 1.00**	*Brian struggled with this, I was often going to him to requesting updates, following up on previous tasks I asked him to complete, status of timeline tasks and reminding him of deadlines. In cases where an update was given by Brian, I often had to ask for more details as the information provided would be vague and not enough for me to make a decision or provide suggestions/feedback. Clients often came to me asking for updates regarding action items Brian was working on for them. From an IC/Client standpoint, I feel Brian also struggles with controlling the project and keeping clients on task, providing timely feedback so that due dates aren't missed. We had a couple clients where Brian felt things going south based on how the client interacted with him, but this information wasn't brought to me until it was too late. This led to me having to take over many projects, travel onsite with a client and perform damage control.* *Goal setting, Brian should work on picking up on client frustrations sooner, be candid with clients to identify where they are feeling apprehensive so that he can manage frustration and/or work with his PM to defuse as many*	

	situations on his own and/or with the help of his PM. **Rating:** edit

Rhea, Shikendra B.

EXHIBIT
16
1/19/22 Harrison Rptr: LO

From:	Harrison, Talia
Sent:	Thursday, October 3, 2019 3:36 PM
To:	Burns, Jamie
Subject:	FW: HR Certification
Follow Up Flag:	Follow up
Flag Status:	Completed

Brian was onsite with Santa Rosa when Bob came to me for assistance with this request. This was after the HR Director asked Brian while he was onsite if this could be done and Brian told them no instead of inquiring with me and telling them he would follow up.

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Senior Project Manager
Tyler Technologies, Inc.

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From: Harrison, Talia
Sent: Thursday, September 12, 2019 7:20 AM
To: Robert Miller <millerr1@flcjn.net>
Cc: Ledbetter, Brian <brian.ledbetter@tylertech.com>
Subject: RE: HR Certification

Hi Bob,

Yes there is a way to have a message that automatically appears when timecards are approved. To create your custom message you'll need to be logged into ExecuTime as an administrator.
Navigate to System Admin > UI Environment Flags > UI > Ctrl + F: Message to show for Timesheet Approvals. In this area you can free text your message, below I've included an insert from the
Integration help document that provides additional details.

Provides a custom message to display on Time Approvals at both the Employee and Supervisor level. It also displays on the Timecard Report, Job Costing Timecard Report, and Hours Approval Report. Use the HTML <span> tag to span custom CSS styles on this message. This allows you to create custom text formatting using fonts, colors, and other CSS text effects.

Please let me know if I can assist with anything else.

Regards,

Talia Harrison
Senior Project Manager
Tyler Technologies, Inc.

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From: Robert Miller <millerr1@flcjn.net>
Sent: Wednesday, September 11, 2019 3:30 PM
To: Harrison, Talia <Talia.Harrison@tylertech.com>
Subject: HR Certification

Talia,

In our training session this afternoon, our HR director asked whether it might be possible to add a statement to the approval screen indicating that by approving the timesheet the employee is certifying that the time entered is true and correct. I told her I would check to see if that would be possible. Do you know if there is any way we could add that statement to our system?

The language that is included on the timesheet system that our Clerk employees currently use is "By submitting this timesheet you are stating that it is a true representation of your time. Falsification of any attendance or leave record shall be cause for the dismissal of the employee or employees involved."

Thank you,

Bob Miller, CPA, CPFO, CGFO
Assistant Director of Finance and Administration
Santa Rosa County Clerk of Courts
6495 Caroline Street, Suite B
Milton, FL 32570
Phone: (850)-983-1963
Fax: (850)-983-1985

EXHIBIT
19
1/19/22 Harrison Rptr: LO

Internal Application Policy

Tyler Technologies is dedicated to helping employees reach their professional goals through growth within a position as well as through internal promotions and transfer opportunities. Although a manager may assist an employee's career development, the employee has the ultimate responsibility for their career at Tyler.

ELIGIBILITY

An internal candidate must meet the following criteria:

- Candidate is a current, regular, full- or part-time employee in good standing.
- Candidate has been assigned to their current position for at least 18 months.

JOB POSTING

Non-confidential job openings for each location are published on Tyler's website. The company may choose not to post a position, if there is an employee within the team or department who is qualified to fill the position, or the opening is a senior-level or management position.

APPLICATION SUBMISSION PROCEDURE

1. Employee completes the internal job application form and electronically attaches an updated resume.
2. Current manager electronically signs the application, and the employee electronically submits it to Human Resources. *Check to see if you are required to have the signature of your department executive/vice president, as well; some departments require this.*
3. Human Resources forwards the internal job application to the hiring manager, once HR confirms that the candidate meets the eligibility requirements.

Interview: Once the hiring manager has identified the internal and external candidate pool, interviews will be scheduled. Based on the response to the position, all internal applicants may not be interviewed.

Selection: The internal or external candidate who, in the judgment of the hiring manager, is the best fit for the position will be selected. If all skills and abilities are considered equal, current Tyler employees will be given preference.

Offer: The position will be offered to the employee once the hiring manager and current manager have agreed on an effective date and a transition plan.

RESPONSIBILITIES

Current Manager

The current manager is responsible for providing performance feedback to the hiring manager on request.

Hiring Manager

Hiring managers are discouraged from soliciting potential internal candidates for their open position. When an employee accepts a transfer and/or promotion, the hiring manager will work with the current manager to establish an effective date and a transition plan that is mutually beneficial to the business needs of both organizations. It is the hiring manager's responsibility to communicate the final decision to the internal candidates who were not selected.

Human Resources

Human Resources will ensure the process is smooth and timely as well as provide internal candidates regular and timely communication regarding the status of their application. If you have any questions throughout the application process, please reach out to the HR contact recruiting for this position.

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Internal Job Application

TO BE COMPLETED BY EMPLOYEE:

Employee Name Talia Harrison	**Today's Date** 10/02/2019
Posted Position Implementation Analyst	**Current Position** Sr. Project Manager - ExecuTime
Hire Date 09/09/2013	**Time in Current Position** 6 yrs

Please answer the following questions:

Describe how your current role has prepared you for this position and how it aligns with your career goals.

I've had the opportunity to implement ExecuTime over the past six years & during this time I've gained ample experience working with multiple Tyler payroll systems as well as those outside of the Tyler realm. I've been able to successful implement client ranging from as little as 50 users to 3500 or more. While I love working as a project manager my personal goal has been to obtain a position that allows to me help other PMs and potentially ICs with less experience achieve some of same milestones. Over the years I've been able to consistently provide other PMs with tips for keeping projects moving by assisting with conflict resolution

Is there anything else you would like us to know about your qualifications for this role?

None that I can think of at this time

TO BE COMPLETED BY CURRENT MANAGER:

Manager Name Jamie Burns	**Date** 10/3/2019
Signature JBurns	**Department Executive Signature (if required)**
Comments	

HR USE ONLY:

☐ 18 months	☐ No Cap	☐ Iview Scheduled	☐ Other HR Team Notified
Position Awarded:	☐ Yes	☐ No	If no, why not?

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The Implementation Analyst position has a direct impact on Tyler's revenue because of the responsibility and accountability for keeping Tyler's client-facing, revenue-generating resources performing at optimal levels of quality and expertise with minimal disruptions due to technical/product issues. The Implementation Analyst demonstrates a highly experienced and in-depth knowledge of Tyler software as well as complex technical issues. The Implementation Analyst ensures the training and support they provide facilitates the resolution of issues and does not interrupt the schedule or budget of implementation projects. Incumbents contribute and provide leadership to assigned implementation field staff.

Responsibilities

- Provide guidance and direction to assigned implementation field staff to ensure they perform at optimal levels of quality and expertise with minimal disruptions due to technical/product issues.
- Provide leadership in the creation of 'best practice' templates, process improvements and knowledge transfer materials to improve efficiencies and customer satisfaction levels.
- Work closely with implementation field staff, Project Managers, and sometimes clients to troubleshoot and resolve critical issues and ensure billable training days are not interrupted.
- Provide non-billable informational sessions by webinar to Implementation Consultants or their clients.
- Identify and document highly complex business/technical specifications for client configuration/build requirements and/or other relevant issues.
- May provide support to the sales team as follows:
- Respond to module- or system-specific questions in proposal documents.
- Resolve client follow-up questions during the proposal process.
- Assist with demonstrations and attend demonstrations to expand knowledge of Tyler products. In some instances may conduct demonstrations to perspective clients.
- May assist the implementation field staff with conversion loading if a client does not have an IT staff or an OSDBA contract.
- Provide follow-up assistance to clients on highly complex applications or processes, as necessary.
- Travel to client sites may be required, as needed.
- Perform other duties as assigned

Qualifications

- Bachelor's degree, or comparable work experience.
- Typically a minimum of four years of experience implementing Tyler software (or equivalent experience).
- Excellent initiative, interpersonal, collaboration and relationship building and customer service experience involving developing professional, trusting and in-depth relationships with internal and external clients (including software development/IT teams, Project Managers, management, clients, etc.).

- Advanced knowledge and experience identifying, defining, analyzing and documenting client work processes, data and systems.
- Proven success record of negotiating and influencing clients to meet their need by proposing viable solutions to complex issues.
- Excellent attention to detail involving defining client complex software requirements (technical and non-technical), client processes, etc.
- Excellent organizational skills with a proven track record of prioritizing and executing on multiple priorities successfully.
- Excellent research, analytical and critical thinking skills and experience in the technical environment involving performing proficient data/gap analysis with outstanding problem solving experience anticipating and resolving root issues of new and the most complex problems.